

Condensed Transcript

UNITED STATES DISTRICT COURT OF OHIO
NORTHERN DISTRICT
WESTERN DIVISION

ROBIE GASTON,)	
)	
)	
Plaintiff,)	
)	
vs.)	Case No.
)	3:18-CV-02642-JJH
FINANCE SYSTEM OF TOLEDO,)	
INC.,)	Judge Helmick
)	
)	
Defendant.)	

- - -

TELEPHONE DEPOSITION OF NANCY QUIROGA

DATE: October 22, 2019 at 11:08 a.m.

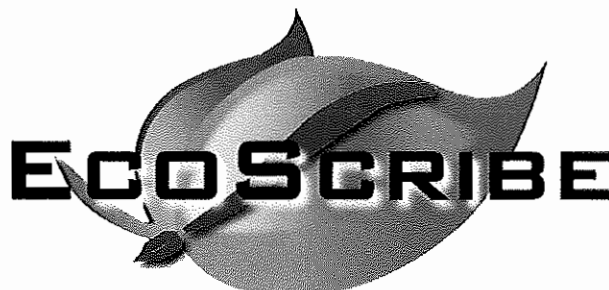
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615 Adams Street
Toledo, Ohio

REPORTER: Casey G. Schreiner, RMR-RDR
Notary Public

- - -

Job No. 31004

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1	APPEARANCES:	1	I N D E X
2	On behalf of the Plaintiff:	2	EXAMINATION
3	ATLAS CONSUMER LAW:	3	Witness Name Page Line
4	Nathan Volheim (via telephone)	3	NANCY QUIROGA
5	2500 South Highland Avenue	4	Examination By Mr. Volheim 5 5
6	Suite 200	4	EXHIBITS
7	Lombard, Illinois 60148	5	Exhibit Description Page Line
8	(630) 575-8181	5	Exhibit A Amended Notice of Deposition ... 12 10
9	On behalf of the Defendant:	6	Exhibit B Answer to Complaint with 13 21
10	LAW OFFICES OF JAMES S. NOWAK:	7	Exhibit C Def. FST First Set of Responses 72 18
11	James S. Nowak	8	to Pla. First Set of Combined
12	4808 North Summit Street	9	Discovery Requests
13	Toledo, Ohio 43611	9	Exhibit F Def. FST Produced Account Notes 24 11
14	(419) 726-2605	10	for Clnt. Epno Toledo Hospital
15	On behalf of the Defendant:	11	ER Physician
16	LAW OFFICE OF BOYD W. GENTRY:	12	Exhibit G Def. FST Produced Account 47 7
17	Boyd W. Gentry (via telephone)	13	Notes
18	4031 Colonel Glenn Highway	14	for Clnt Allstar Disposal and
19	Beavercreek, Ohio 45431	15	Recycling
20	(937) 839-2881	16	Exhibit H Def. Fst Produced Accoujnt Notes 62 2
21	ALSO PRESENT:	17	for Toledo Clinic, Inc.,
22	Amy Pfeiffer	18	Reference No. 28093807001
23		19	Exhibit I Def. FST Produced Account Notes 53 4
24		20	for Toledo Clinic, Inc.,
		21	Reference No. 27962730001
		22	Exhibit J Def. Fst Produced Accoujnt Notes 65 13
		23	for Toledo Clinic, Inc.,
		24	Reference No. 20000967861601954
			Exhibit L Def. FST Produced Account Notes 36 18
			for Various Accounts
			Exhibit M Letter from Finance System of .. 18 10
			Toledo, Inc
			(Depositions Exhibits D, E, and K, were
			pre-marked but not used.)
		20	OBJECTIONS
		21	By Page Line
		22	Mr Gentry 26 12
		23	Mr Gentry 38 13
		24	Mr Gentry 41 18
			Mr Gentry 42 14
			Mr Gentry 50 8
			Mr Gentry 50 15
			Mr Gentry 51 12
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1	Mr Gentry 51 23	1	NANCY QUIROGA,
2	Mr Gentry 52 20	2	a Witness herein, called by the Plaintiff as if upon
3	Mr Gentry 58 12	3	Examination, was by me first duly sworn, as
4	Mr Gentry 59 16	4	hereinafter certified, deposed and said as follows:
5	Mr Gentry 60 10	5	EXAMINATION
6		6	BY MR. VOLHEIM:
7		7	Q. Good morning. Can you state your full
8		8	name for the record, please.
9		9	A. Nancy Quiroga.
10		10	Q. And for our court reporter's benefit, can
11		11	you please spell your last name?
12		12	A. Q-u-i-r-o-g-a.
13		13	Q. Good morning, Ms. Quiroga.
14		14	A. Good morning.
15		15	Q. I apologize right off the bat if I, at
16		16	any point today, mispronounce your name. My name is
17		17	Nate Volheim. I am representative and counsel for the
18		18	plaintiff in this matter.
19		19	This is the matter of my client Robie
20		20	Gaston vs. Finance System of Toledo. It was filed in
21		21	the Northern District of Ohio under Case No. 18,
22		22	civil, 02652.
23		23	Ms. Quiroga, have you ever given
24		24	deposition testimony before?

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<p style="text-align: right;">Page 6</p> <p>1 A. No.</p> <p>2 Q. Okay. Whether you've done it a whole</p> <p>3 bunch or this is your first time, there is a couple of</p> <p>4 kind of helpful ground rules I want to go over.</p> <p>5 As you can tell, I'm appearing from my</p> <p>6 office -- or you can't tell where I'm appearing, but</p> <p>7 I'm in my office in Lombard, Illinois. There's no one</p> <p>8 else with me. One of your counsel is over the phone,</p> <p>9 as well, and then you also have counsel there present</p> <p>10 with you.</p> <p>11 Other than counsel that is present in the</p> <p>12 room with you and our court reporter, can you please</p> <p>13 state who else is in the room with you?</p> <p>14 A. Amy Pfeiffer.</p> <p>15 Q. Okay. Other than Ms. Pfeiffer and our</p> <p>16 court reporter, yourself and counsel, is there anyone</p> <p>17 else in the room with you right now?</p> <p>18 A. No.</p> <p>19 Q. Okay. So, obviously, because we have</p> <p>20 people appearing telephonically, that makes it a</p> <p>21 little bit more difficult. I assume that you can hear</p> <p>22 me very clearly right now?</p> <p>23 A. Yes.</p> <p>24 Q. Great. If, for whatever reason, you</p>	<p style="text-align: right;">Page 7</p> <p>1 cannot hear me, please just let me know, and I'll make</p> <p>2 sure to repeat my question; however, if I ask a</p> <p>3 question and you give an answer, I'm going to presume</p> <p>4 that you understand the question.</p> <p>5 Is that fair?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. You're doing an amazing job so</p> <p>8 far, but it's important to make sure to keep all of</p> <p>9 your answers verbal.</p> <p>10 Again, because I'm not in the room, and</p> <p>11 because the proceedings are being transcribed, head</p> <p>12 nods and body movement, that's not going to be picked</p> <p>13 up, so it's very important to make sure that you keep</p> <p>14 your answers verbal; is that understood?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Great. And if I have to remind</p> <p>17 you, again, I'm not doing it to be offensive. I'll</p> <p>18 just let you know that I need a different answer, but</p> <p>19 it's in no way to be disrespectful.</p> <p>20 A couple other things. I do not</p> <p>21 anticipate this deposition lasting more than two hours</p> <p>22 today; however, if, at any point during this</p> <p>23 deposition, you or anyone in the room needs to take a</p> <p>24 break, that's fine. You're entitled to as many breaks</p>
<p style="text-align: right;">Page 8</p> <p>1 as you would like.</p> <p>2 The only thing that I ask is that if we</p> <p>3 are in the middle of a question, we need to go ahead</p> <p>4 and finish answering my question before we take a</p> <p>5 break; is that agreed?</p> <p>6 A. Yes.</p> <p>7 Q. Great. Periodically throughout this</p> <p>8 deposition, your counsel is likely to make objections,</p> <p>9 either because they don't like the question I asked or</p> <p>10 I did not ask it in the right way, which is entirely</p> <p>11 likely.</p> <p>12 Unless your counsel instructs you not to</p> <p>13 answer, once your counsel makes the objection, you can</p> <p>14 go ahead and answer the question; is that understood?</p> <p>15 A. Yes.</p> <p>16 Q. Great.</p> <p>17 MR. GENTRY: Nancy, this is</p> <p>18 Boyd. I will direct you as much as I can</p> <p>19 remember to either go ahead and answer or</p> <p>20 to not answer so that you're not left</p> <p>21 wondering.</p> <p>22 BY MR. VOLHEIM:</p> <p>23 Q. Okay. Again, I don't say this to be</p> <p>24 offensive in any way, but you understand that you are</p>	<p style="text-align: right;">Page 9</p> <p>1 under oath here this morning?</p> <p>2 A. Yes.</p> <p>3 Q. And that your answers are subject to the</p> <p>4 penalty of perjury?</p> <p>5 A. Yes.</p> <p>6 Q. And then last question, you are not under</p> <p>7 the influence of any substances, either legal or</p> <p>8 illegal, that would impair your testimony to -- your</p> <p>9 testimony here today; is that correct?</p> <p>10 A. Correct.</p> <p>11 Q. So you've stated your name. Can you</p> <p>12 please state your current occupation?</p> <p>13 A. I'm the client services manager at</p> <p>14 Finance System of Toledo.</p> <p>15 Q. Okay. Great. And how long have you</p> <p>16 served in that role?</p> <p>17 A. It's coming up on 20 years.</p> <p>18 Q. Congratulations.</p> <p>19 A. Thank you.</p> <p>20 Q. Have you held any other roles with</p> <p>21 Finance System of Toledo other than your current role?</p> <p>22 A. Yes.</p> <p>23 Q. What -- immediately preceding your</p> <p>24 current role, what other role did you hold at</p>

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<p style="text-align: right;">Page 10</p> <p>1 Finance System of Toledo?</p> <p>2 A. The collections manager.</p> <p>3 Q. And how long did you serve in that role?</p> <p>4 A. Maybe two years.</p> <p>5 Q. Prior to that role, have you held any</p> <p>6 other roles with Finance System of Toledo?</p> <p>7 A. No.</p> <p>8 Q. Okay. So is it fair to say that you've</p> <p>9 been with Finance System of Toledo for about 22 years?</p> <p>10 A. No. Combined 20 years. I'm sorry.</p> <p>11 Q. Thank you for clarifying. Have those 20,</p> <p>12 approximately 20 years been consecutive?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. You haven't held any other jobs or</p> <p>15 any other occupations during that time?</p> <p>16 A. No.</p> <p>17 Q. Just as a general overview, can you tell</p> <p>18 me what kind of duties are involved in your current</p> <p>19 role?</p> <p>20 A. I'm the liaison between the client,</p> <p>21 staff, and the attorneys' offices, and the hospital,</p> <p>22 staff, administrative offices.</p> <p>23 Q. Okay. And from your answer, are all of</p> <p>24 Finance System of Toledo's clients medical providers,</p>	<p style="text-align: right;">Page 11</p> <p>1 or does it have other clients as well?</p> <p>2 A. Other clients.</p> <p>3 Q. Okay. And you handle other clients as a</p> <p>4 liaison, as well, not just medical clients?</p> <p>5 A. Correct.</p> <p>6 Q. Just a few more background questions.</p> <p>7 What is the highest level of education that you have</p> <p>8 achieved?</p> <p>9 A. Some college.</p> <p>10 Q. Okay. Did you get any sort of degree in</p> <p>11 college?</p> <p>12 A. No.</p> <p>13 Q. Do you have your high school diploma?</p> <p>14 A. Yes.</p> <p>15 Q. And I just want to make sure. You are</p> <p>16 not a licensed attorney; is that correct?</p> <p>17 A. That is correct.</p> <p>18 Q. Good for you. We have too many of those.</p> <p>19 Okay. Just generally, I'm not asking for</p> <p>20 your legal opinion in any way, what is your</p> <p>21 understanding of why you are here today?</p> <p>22 A. Based on the lawsuit that Mr. Gaston</p> <p>23 filed.</p> <p>24 Q. Okay. Our court reporter should have</p>
<p style="text-align: right;">Page 12</p> <p>1 some exhibits for you. I don't necessarily think</p> <p>2 we'll be using all the exhibits, so don't be afraid by</p> <p>3 the pile if you can see it.</p> <p>4 I'm going to ask our court reporter to</p> <p>5 hand you what has been pre-marked as Exhibit A, as in</p> <p>6 "apple." And if you can, take a look at that</p> <p>7 document, look through it, let me know after you've</p> <p>8 had a chance to review it.</p> <p>9 A. Okay.</p> <p>10 (Deposition Exhibit A was</p> <p>11 presented to the witness.)</p> <p>12 MR. VOLHEIM: Great. For the</p> <p>13 record, Exhibit A has been pre-labeled</p> <p>14 Amended Notice of Deposition.</p> <p>15 BY MR. VOLHEIM:</p> <p>16 Q. Have you seen this document before today?</p> <p>17 A. Yes.</p> <p>18 Q. Approximately when was the first time</p> <p>19 that you saw this document?</p> <p>20 A. Honestly, I can't be certain.</p> <p>21 Q. If you flip to page 2 of this document --</p> <p>22 actually, it would be page 3 for you with the cover</p> <p>23 sheet, there is a list of topics, 1 through 23.</p> <p>24 Do you see those topics?</p>	<p style="text-align: right;">Page 13</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Is it your understanding that</p> <p>3 Finance System of Toledo has designated you as their</p> <p>4 corporate representative to testify to topics 1</p> <p>5 through 23?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. And other than any objections your</p> <p>8 counsel may make throughout these proceedings, are you</p> <p>9 able to accurately and fully testify as to topics 1</p> <p>10 through 23?</p> <p>11 A. If it's anything legal, then, no ...</p> <p>12 Q. But other than legal opinions or issues,</p> <p>13 you're able to testify to topics 1 through 23?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Thank you. I believe you can put</p> <p>16 that aside. I don't know that we'll be using that</p> <p>17 again. I'm going to ask you to take a look -- well,</p> <p>18 actually -- yeah, actually, I'll ask the court</p> <p>19 reporter to hand you what's been pre-marked as Exhibit</p> <p>20 B, as in "boy."</p> <p>21 (Deposition Exhibit B was</p> <p>22 presented to the witness.)</p> <p>23 BY MR. VOLHEIM:</p> <p>24 Q. And once you've flipped through that, let</p>

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<p>Page 14</p> <p>1 me know. I don't anticipate asking you very much 2 about this, but let me know when you're done reviewing 3 that. 4 (Pause.) 5 THE WITNESS: Okay. 6 MR. VOLHEIM: Thank you. For 7 the record, Exhibit B is Defendant's 8 Answer to Complaint with Counterclaims. 9 BY MR. VOLHEIM: 10 Q. I'm going to ask you to flip to the 11 second-to-last page. 12 A. Okay. 13 Q. On the second-to-last page, there are 14 additional defenses. There is an additional defense 15 in No. 3 which is what I want to direct your attention 16 to. 17 Is it your understanding that 18 Finance System of Toledo has withdrawn this defense? 19 A. You would have to ask the attorney that. 20 MR. VOLHEIM: Boyd, I know that 21 you had indicated that your client is 22 withdrawing affirmative -- the 23 affirmative defense of bona fide error. 24 Can you stipulate to that on the</p>	<p>Page 15</p> <p>1 record, please? 2 MR. GENTRY: Well, because we 3 only have one claim left of use of the 4 word "interest," and the other claim had 5 been dismissed by the court, we are not 6 going to claim that an error was made. 7 And, so, therefore, we do not 8 anticipate putting forth the defense that 9 an error was made in good faith. It is 10 our position that no error was made. 11 So, yes, we do not intend to put 12 forth evidence of a procedure designed to 13 avoid an error, because we believe with 14 this claim there was no error. 15 MR. VOLHEIM: Okay. And are you 16 guys going to file an amended answer or 17 something with the court withdrawing that 18 affirmative defense? 19 MR. GENTRY: We can discuss 20 that. I had not anticipated doing that, 21 but I can certainly discuss that. I'm 22 open to doing that to make the record 23 clear. 24 MR. VOLHEIM: Okay. Well, we're</p>
<p>Page 16</p> <p>1 going to either need to stipulate to 2 that, or we're going to need something to 3 be filed. 4 I mean, I appreciate that 5 defendant doesn't anticipate, but 6 "anticipate," is not, as I'm sure you 7 know, a definitive response. 8 So if you're not comfortable 9 stipulating to that right now, then I 10 guess we're going to have to -- we don't 11 need to adjourn the deposition, but I'm 12 going to adjourn any topics related to 13 policies and procedures of bona fide 14 error, because I don't know if it's 15 formally withdrawn or not. 16 MR. GENTRY: Understood. And I 17 think that's fair for today. I won't -- 18 if something changes in the case, right, 19 and it turns out that we would rely on 20 this, some theory has changed on the 21 prosecution of the claim or something 22 like that, then I would certainly 23 understand that you would want a 24 follow-up deposition on that topic.</p>	<p>Page 17</p> <p>1 I would not argue against your 2 right to do a deposition or seek further 3 discovery as to that. 4 But as it stands now, the way 5 the court has limited the case from what 6 it was in the beginning, we are not 7 relying on the bona fide error. 8 MR. VOLHEIM: Okay. Thank 9 you. 10 BY MR. VOLHEIM: 11 Q. You can set aside Exhibit B. 12 I'm not asking for your legal opinion in 13 any way, but what is your understanding of what my 14 client has alleged that Finance System of Toledo did 15 wrong? 16 A. Regarding the -- the table and the 17 columns on the table. 18 Q. And when you say "regarding the table and 19 the columns on the table," are you referring to a 20 collection correspondence that Finance System of 21 Toledo sent my client? 22 A. Yes. 23 Q. Okay. And more specific than that, are 24 you referring to the collection correspondence that</p>

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<p style="text-align: right;">Page 18</p> <p>1 Finance System of Toledo sent my client dated January 2 15th, 2018?</p> <p>3 A. Can I see a copy of that? 4 Q. Of course. 5 A. Is that an exhibit somewhere? 6 Q. Yes.</p> <p>7 MR. VOLHEIM: I'll ask our court 8 reporter to hand you what's been 9 pre-marked as Exhibit M, as in "Mary." 10 (Deposition Exhibit M was 11 presented to the witness.)</p> <p>12 BY MR. VOLHEIM: 13 Q. And when you have a chance to review 14 Exhibit M, please let me know. I think you can skip 15 the first letter, but, obviously, feel free to review 16 whatever you'd like.</p> <p>17 A. Okay. 18 Okay.</p> <p>19 MR. VOLHEIM: For the record, 20 Exhibit M is some correspondence sent by 21 Finance System of Toledo to our client.</p> <p>22 BY MR. VOLHEIM: 23 Q. I was asking you if the table you were 24 referring to appears on the January 15th, 2018,</p>	<p style="text-align: right;">Page 19</p> <p>1 correspondence. 2 A. Yes. 3 Q. Okay. Great. If you could just set that 4 aside, we're definitely going to come back to that 5 one. But if you could go ahead and set that aside. 6 How many accounts -- how many different 7 accounts has Finance System of Toledo had in the last 8 two years with regards to my client?</p> <p>9 A. I could not tell you. 10 Q. Do you know if it's more than one 11 account?</p> <p>12 A. I don't know. 13 Q. Okay. I'm going to be using the 14 shorthand FDCPA. Is it your understanding or can we 15 agree that when I say FDCPA, I'm referring to the Fair 16 Debt Collection Practices Act?</p> <p>17 A. Yes. 18 Q. Just for background, what is your 19 familiarity with the FDCPA?</p> <p>20 A. General. 21 Q. Have you had any training with regards to 22 the FDCPA?</p> <p>23 A. Just kind of self-training. 24 Q. Okay. And when you say "self-training,"</p>
<p style="text-align: right;">Page 20</p> <p>1 what does that entail?</p> <p>2 A. Reviewing the FDCPA documents. 3 Q. Okay. Are you referring to the law 4 regarding the FDCPA, or what documents are you 5 referring to?</p> <p>6 A. What's listed on the ACA website. 7 Q. Okay. Have you taken any class or do you 8 hold any certifications with regards to the FDCPA?</p> <p>9 A. No.</p> <p>10 MR. GENTRY: I'm sorry. This s 11 Boyd Gentry just rejoining. I think the 12 conference line cut me off or dropped me, 13 so I dialed in. I think I missed about a 14 minute there. I apologize for that.</p> <p>15 MR. VOLHEIM: Do you need our 16 court reporter to read back the last 17 minute, or can we keep going?</p> <p>18 MR. GENTRY: Jim, I guess you're 19 there on the ground. Do I need anything 20 or -- I'm not sure what happened?</p> <p>21 MR. NOWAK: No, you're fine. 22 These were just some background questions 23 on her qualifications to understand the 24 FDCPA.</p>	<p style="text-align: right;">Page 21</p> <p>1 MR. GENTRY: Okay. Go ahead. 2 BY MR. VOLHEIM: 3 Q. Okay. I'm going to ask our court 4 reporter to hand you what's -- before we get to that, 5 I'm sorry.</p> <p>6 So in your role as client liaison, do you 7 have direct contact with the entities that utilize 8 Finance System of Toledo's services?</p> <p>9 A. Yes. 10 Q. And we can get into specific examples, 11 but just kind of generally, when an entity places an 12 account or accounts with Finance System of Toledo, 13 does it direct Finance System of Toledo about how it 14 wants Finance System to go about collecting on that 15 account?</p> <p>16 A. It would depend. 17 Q. And what does it depend on?</p> <p>18 A. The circumstance of that account or that 19 client. 20 Q. Okay. So is it fair to say different 21 clients have different circumstances or different 22 requirements about how they want Finance System of 23 Toledo to go about collecting their debt?</p> <p>24 A. Yes.</p>

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<p style="text-align: right;">Page 22</p> <p>1 Q. Are those circumstances or requirements 2 outlined in any documentation? 3 A. Not necessarily. 4 Q. Okay. Are they sometimes outlined in any 5 documentation? 6 A. I really don't know, to be honest. 7 Q. Okay. So if I'm a hospital and I want 8 Finance System of Toledo to collect debt on me, is 9 there an agreement between me and Finance System of 10 Toledo? 11 A. Sometimes. 12 Q. But not always? 13 A. Correct. 14 Q. If there is an agreement, will the terms 15 of how I want my debt collected be within that 16 agreement? 17 MR. GENTRY: I'm sorry. This is 18 Boyd. I just want to, I guess, clarify. 19 Do you mean a written agreement? That's 20 what you're referring to? 21 MR. VOLHEIM: Sure. We can 22 clarify. 23 BY MR. VOLHEIM: 24 Q. If there was a written agreement, are the</p>	<p style="text-align: right;">Page 23</p> <p>1 terms of how Finance System of Toledo wants -- excuse 2 me. Strike that. 3 If there is a written agreement, will the 4 terms of how the client wants the debt collected be in 5 that written agreement? 6 A. Sometimes. 7 Q. Okay. Well, let's get more specific, 8 then, I suppose. I'm going to direct your attention 9 back to Exhibit M, and if you can grab that document 10 again and turn to the last page -- 11 A. Okay. 12 Q. -- there is a client name of EPNO, Inc., 13 Toledo. Did EPNO, Inc., Toledo engage Finance System 14 of Toledo to collect debt on its behalf against my 15 client? 16 A. Yes. 17 Q. Okay. Is there an agreement -- a written 18 agreement between EPNO, Inc., of Toledo, and -- excuse 19 me. 20 Is there a written agreement between 21 EPNO, Inc., of Toledo and Finance System of Toledo on 22 how it wants its debt collected? 23 A. No. 24 Q. Is there any written correspondence</p>
<p style="text-align: right;">Page 24</p> <p>1 between EPNO, Inc., Toledo, and Finance System of 2 Toledo on how to collect the account listed on Exhibit 3 M? 4 A. No. 5 Q. I'm going to ask you to go to -- I'm 6 going to direct your attention to what's been 7 pre-labeled or pre-marked as Exhibit F. And if our 8 court reporter could hand you that, look through 9 Exhibit F and let me know when you've had a chance to 10 review that. 11 (Deposition Exhibit F was 12 presented to the witness.) 13 THE WITNESS: Okay. 14 MR. VOLHEIM: Okay. For the 15 record, Exhibit F has been pre-labeled 16 Defendant FST Produced Account note for 17 Client EPNO Hospital ER Physician. 18 BY MR. VOLHEIM: 19 Q. Have you seen Exhibit F before today? 20 A. Yes. 21 Q. Okay. When was the first time you saw 22 Exhibit F? 23 A. I don't really remember. 24 Q. Okay. What is Exhibit F?</p>	<p style="text-align: right;">Page 25</p> <p>1 A. It appears to be a printout of the 2 account and account notes. 3 Q. Okay. When was the debt associated with 4 Exhibit F placed with Finance System of Toledo? 5 A. This account was assigned on 7-23 of '13. 6 Q. Okay. So that would be July 23rd of 7 2013? 8 A. Correct. 9 Q. Okay. Did Finance System of Toledo 10 engage in debt collection activity against my client 11 regarding this account? 12 A. Yes. 13 Q. Okay. Was this account -- when this 14 account was placed with Finance System of Toledo, what 15 was the balance of the account? 16 A. The assigned amount was 66.37. 17 Q. How much interest was assigned -- how 18 much interest was assigned on this account at 19 placement? 20 A. Zero. 21 Q. How much in attorney fees was assigned 22 with this account at placement? 23 A. Zero. 24 Q. How much court costs was assigned with --</p>

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<p style="text-align: right;">Page 26</p> <p>1 at placement with this account?</p> <p>2 A. Zero.</p> <p>3 Q. Okay. How much miscellaneous fees was</p> <p>4 assigned with this account at placement?</p> <p>5 A. Zero.</p> <p>6 Q. How much contingency fees was assigned</p> <p>7 with this account at placement?</p> <p>8 A. Zero.</p> <p>9 Q. Was there any amount added to the balance</p> <p>10 on this account at any time that Finance System of</p> <p>11 Toledo had the account other than 66.37?</p> <p>12 MR. GENTRY: Objection.</p> <p>13 Go ahead and answer.</p> <p>14 MR. VOLHEIM: Just for clarity,</p> <p>15 Boyd, what is your objection?</p> <p>16 MR. GENTRY: As to -- you say</p> <p>17 was there any amount added to this, and I</p> <p>18 think it's a vague question about how the</p> <p>19 \$66.37 was derived. That's how I</p> <p>20 understood it.</p> <p>21 MR. VOLHEIM: Okay. Let me try</p> <p>22 to clean it up, then.</p> <p>23 BY MR. VOLHEIM:</p> <p>24 Q. The assigned amount, 66.37, that was the</p>	<p style="text-align: right;">Page 27</p> <p>1 amount that was put with Finance System of Toledo at</p> <p>2 placement; is that correct?</p> <p>3 A. Correct.</p> <p>4 Q. Okay. What does that amount -- what is</p> <p>5 that comprised of?</p> <p>6 A. The balance that EPNO sent over. I don't</p> <p>7 have the details.</p> <p>8 Q. So was any amount -- from the time</p> <p>9 Finance System of Toledo received this account until</p> <p>10 the time the account was satisfied, was any amount</p> <p>11 added to the balance?</p> <p>12 A. I cannot be certain.</p> <p>13 Q. If any amount was added to the balance,</p> <p>14 would it be reflected in these account notes?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. In reviewing these account notes,</p> <p>17 can you see any amount added to the balance of 66.37?</p> <p>18 A. No.</p> <p>19 Q. Okay. When was -- how long was this</p> <p>20 account with Finance System of Toledo?</p> <p>21 A. How long was it with Finance System of</p> <p>22 Toledo?</p> <p>23 Q. Yes.</p> <p>24 A. Since its assigned date of 7-23 of '13.</p>
<p style="text-align: right;">Page 28</p> <p>1 Q. Okay. So was this account satisfied in</p> <p>2 any way?</p> <p>3 A. The balance was paid.</p> <p>4 Q. Who was the balance paid by?</p> <p>5 A. There was a 20 dollar payment made to the</p> <p>6 client, to EPNO, and two payments made to</p> <p>7 Finance System of Toledo.</p> <p>8 Q. Okay. When was the last payment made to</p> <p>9 Finance System of Toledo?</p> <p>10 A. 10-24 of '17.</p> <p>11 Q. And when that last payment was made to</p> <p>12 Finance System of Toledo, what was the remaining</p> <p>13 balance on the account?</p> <p>14 A. Zero.</p> <p>15 Q. Okay. Was the account closed at that</p> <p>16 time?</p> <p>17 A. No.</p> <p>18 Q. Okay. Why was the account not closed if</p> <p>19 the balance was paid in full?</p> <p>20 A. Because the account is paid in full.</p> <p>21 It's zero.</p> <p>22 Q. Okay. So does Finance System of Toledo</p> <p>23 keep all the accounts that it has, whether they're</p> <p>24 paid or not?</p>	<p style="text-align: right;">Page 29</p> <p>1 A. Correct.</p> <p>2 Q. And what purpose does it keep them for?</p> <p>3 A. The consumer. You know, we like to keep</p> <p>4 accurate records, and the consumer likes to see what</p> <p>5 has been paid on -- you know, what's in our system.</p> <p>6 Q. And now you're speaking -- when you say</p> <p>7 "consumer," are you speaking in general, or are you</p> <p>8 speaking to my client, Robie Gaston?</p> <p>9 A. In general.</p> <p>10 Q. Okay. Did my client, Robie Gaston, ever</p> <p>11 ask Finance System of Toledo to keep the account, this</p> <p>12 account open?</p> <p>13 A. I wouldn't know.</p> <p>14 Q. Okay. Is there anything reflected in</p> <p>15 these account notes that states my client asked</p> <p>16 Finance System of Toledo to keep this account open?</p> <p>17 A. I did not see that.</p> <p>18 Q. Okay. So going back to it, my client</p> <p>19 paid this account in full on October 24th, 2017; is</p> <p>20 that correct?</p> <p>21 A. His final payment, yes, 10-24 of '17.</p> <p>22 Q. And after that payment, the balance was</p> <p>23 zero?</p> <p>24 A. Correct.</p>

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<p style="text-align: right;">Page 30</p> <p>1 MR. GENTRY: This is Boyd. I'm 2 not sure why you're spending so much time 3 on an account that is not at issue in 4 your remaining claim, which is the second 5 letter of Exhibit M, right? The only 6 thing left -- 7 MR. VOLHEIM: It's background. 8 MR. GENTRY: The only thing 9 relevant is the January 2018 letter. 10 MR. VOLHEIM: Right. And this 11 account is reflected on the January 2018 12 letter. 13 MR. GENTRY: The 66 dollar 14 account is? 15 MR. VOLHEIM: Yeah, Boyd, it is. 16 Why don't you look at line F -- or excuse 17 me, the top line of the January 15th, 18 2018, letter. 19 MR. GENTRY: I'm sorry. I 20 misunderstood you. Go ahead. 21 BY MR. VOLHEIM: 22 Q. Okay. So your counsel is actually going 23 to make my point for me here. Excuse me. Strike 24 that.</p>	<p style="text-align: right;">Page 31</p> <p>1 If this account was closed -- excuse me. 2 Strike that. 3 If this account was paid in full on 4 October 24th, 2017, then why is it listed on the 5 correspondence sent by Finance System of Toledo of 6 January 15th, 2018? 7 A. Because we provide accurate records for 8 our consumers. 9 Q. So based on that testimony, then, is it 10 fair to say that any account my client ever had with 11 Finance System of Toledo, whether it was paid or not, 12 would be listed on this January 15th, 2018, letter? 13 A. No. 14 Q. Okay. Well, how does Finance System of 15 Toledo determine which accounts will be listed and 16 which ones won't? 17 A. It depends when it was paid; it depends 18 on the list of accounts that were being worked at that 19 particular time. There is a lot of variables. 20 Q. Okay. Well, I'm going to need to push 21 back on that. I'm going to need to understand these 22 variables. 23 So at what point, how long -- if an 24 account's paid, how long would Finance System of</p>
<p style="text-align: right;">Page 32</p> <p>1 Toledo continue to send correspondence regarding that 2 account? 3 A. It truly depends. It just truly depends. 4 Q. No, I understand it depends. But I'm 5 trying to understand what it depends on. 6 A. If I use -- 7 MR. GENTRY: Wait a minute, 8 Nancy, that's not a question. Please 9 wait for a question. 10 THE WITNESS: Okay. 11 MR. GENTRY: He said he's trying 12 to understand what it depends on, but 13 that's not a question. Let him formulate 14 a question, please. 15 BY MR. VOLHEIM: 16 Q. What does it depend on? 17 A. Again, there are many variables. 18 Q. Okay. I believe you stated one of those 19 variables is when the debt is paid; is that correct? 20 A. I'm going to use -- yes. But I will use 21 the example of the accounts that are on that table. 22 Q. Okay. So let's start with the top one, 23 EPNO, Inc., of Toledo. 24 A. Okay.</p>	<p style="text-align: right;">Page 33</p> <p>1 Q. That account, as you testified, was paid 2 on October 24th, 2017. So my question is how long, 3 after an account is paid in full, will Finance System 4 of Toledo still continue to send correspondence on it? 5 A. In using this example of this table, the 6 accounts that are paid on this table will remain there 7 until the other accounts are paid. They're worked as 8 a group. 9 Q. Okay. Let me make sure I understand 10 that. If you go down to the second account included 11 in the January 15th, 2018, letter, there is an account 12 for Allstar Disposal. 13 What does Allstar Disposal have to do 14 with any of the other accounts on this list? 15 A. It was a debt that was owed. 16 Q. Okay. Who was it owed to? 17 A. Allstar Disposal. 18 Q. Based on your knowledge, does Allstar 19 Disposal have any relationship whatsoever with Toledo 20 Clinic, Inc.? 21 A. No. 22 Q. Based on your knowledge, does Allstar 23 Disposal have any relationship at all with EPNO, Inc., 24 of Toledo?</p>

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<p style="text-align: right;">Page 34</p> <p>1 A. Not to my knowledge, no.</p> <p>2 Q. So if Allstar Disposal, to your</p> <p>3 knowledge, doesn't have any relationship with those</p> <p>4 entities, why is it included on this list?</p> <p>5 A. Because the accounts are grouped</p> <p>6 together.</p> <p>7 Q. Who groups them together?</p> <p>8 A. Our software.</p> <p>9 Q. Who makes the decision to have your</p> <p>10 software group them together?</p> <p>11 A. A collector.</p> <p>12 Q. Finance System of Toledo?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. So is it your testimony that any</p> <p>15 account on this letter with a zero balance is included</p> <p>16 because the collector decided to group those accounts</p> <p>17 together?</p> <p>18 A. Okay. Can you repeat that again?</p> <p>19 MR. VOLHEIM: Sure. Ms. Court</p> <p>20 Reporter, can you please read back that</p> <p>21 question.</p> <p>22 (Court Reporter read back the</p> <p>23 following:</p> <p>24 "Question: So is it your</p>	<p style="text-align: right;">Page 35</p> <p>1 testimony that any account on this letter</p> <p>2 with a zero balance is included because</p> <p>3 the collector decided to group those</p> <p>4 accounts together?")</p> <p>5 THE WITNESS: Yes.</p> <p>6 BY MR. VOLHEIM:</p> <p>7 Q. And why did a collector decide to group</p> <p>8 these accounts together?</p> <p>9 A. As I stated, they work the accounts</p> <p>10 together.</p> <p>11 Q. What is the name of the collector that</p> <p>12 was working these accounts?</p> <p>13 A. There were probably several.</p> <p>14 Q. Okay. So if there were several</p> <p>15 collectors working this account, which one made the</p> <p>16 decision to group them together?</p> <p>17 A. I can't tell you exactly.</p> <p>18 Q. Did Finance System of Toledo group these</p> <p>19 accounts together with the permission of Allstar</p> <p>20 Disposal?</p> <p>21 A. I don't know.</p> <p>22 Q. Did Finance System of Toledo group these</p> <p>23 accounts together with the permission of Toledo</p> <p>24 Clinic, Inc.?</p>
<p style="text-align: right;">Page 36</p> <p>1 A. I don't know.</p> <p>2 Q. Did Finance System group these accounts</p> <p>3 together with the permission of EPNO, Inc.</p> <p>4 A. I do not know.</p> <p>5 Q. Does Finance System of Toledo have any</p> <p>6 records, either written or otherwise, which would tell</p> <p>7 you if they had permission to group these accounts</p> <p>8 together?</p> <p>9 A. Not to my knowledge.</p> <p>10 Q. So did my client -- other than the debts</p> <p>11 listed or the accounts listed on the January 15th,</p> <p>12 2018, correspondence, did my client have any other</p> <p>13 accounts placed with Finance System of Toledo?</p> <p>14 A. I really don't know.</p> <p>15 MR. VOLHEIM: Okay. I'm going</p> <p>16 to ask you to turn to what's been</p> <p>17 pre-marked as Exhibit L.</p> <p>18 (Deposition Exhibit L was</p> <p>19 presented to the witness.)</p> <p>20 THE WITNESS: Okay.</p> <p>21 BY MR. VOLHEIM:</p> <p>22 Q. Exhibit L is Defendant Finance System of</p> <p>23 Toledo Produced Account Notes for Various Accounts.</p> <p>24 Have you seen Exhibit L before today?</p>	<p style="text-align: right;">Page 37</p> <p>1 A. Yes.</p> <p>2 Q. When did you first see Exhibit L?</p> <p>3 A. I don't remember.</p> <p>4 Q. Okay. What is Exhibit L?</p> <p>5 A. It's the -- what we refer to as a header</p> <p>6 account.</p> <p>7 Q. And for clarity, what is a header</p> <p>8 account?</p> <p>9 A. It's the main account that holds the --</p> <p>10 holds the listing of accounts.</p> <p>11 Q. Okay. And what -- would this header</p> <p>12 account have listed all the accounts that</p> <p>13 Finance System of Toledo had with respect to my</p> <p>14 client?</p> <p>15 A. Not necessarily.</p> <p>16 Q. Okay. What -- what accounts would not be</p> <p>17 listed there?</p> <p>18 A. If he had other accounts that were paid</p> <p>19 and were not -- were not in this time frame, you know.</p> <p>20 MR. VOLHEIM: All right. Just</p> <p>21 one moment, please.</p> <p>22 MR. GENTRY: Nancy, do you need</p> <p>23 a break? We have been going for about an</p> <p>24 hour now.</p>

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<p style="text-align: right;">Page 38</p> <p>1 THE WITNESS: No, I'm okay.</p> <p>2 Thank you.</p> <p>3 MR. GENTRY: Okay. Speak up if</p> <p>4 you do. Just speak up.</p> <p>5 THE WITNESS: Okay.</p> <p>6 BY MR. VOLHEIM:</p> <p>7 Q. In reviewing Exhibit L -- strike that.</p> <p>8 Now, in reviewing Exhibit L, are there</p> <p>9 any accounts that Finance System of Toledo had placed</p> <p>10 with it regarding my client that are not listed on</p> <p>11 Exhibit -- excuse me, the ledger that we have been</p> <p>12 speaking about?</p> <p>13 MR. GENTRY: Objection. I'm</p> <p>14 not sure I understand that.</p> <p>15 Go ahead if you understand that,</p> <p>16 Nancy.</p> <p>17 THE WITNESS: No, I was going to</p> <p>18 ask if you could rephrase it or repeat</p> <p>19 it.</p> <p>20 BY MR. VOLHEIM:</p> <p>21 Q. Okay. So you're going to have to look at</p> <p>22 both Exhibit M and Exhibit L together. Directing your</p> <p>23 attention to Exhibit M, there are five accounts listed</p> <p>24 on the ledger we have been speaking about.</p>	<p style="text-align: right;">Page 39</p> <p>1 Do you agree with me on that?</p> <p>2 A. Correct.</p> <p>3 Q. Okay. Other than those five accounts,</p> <p>4 are there any other accounts placed with</p> <p>5 Finance System of Toledo regarding my client that was</p> <p>6 listed in Exhibit L?</p> <p>7 A. I don't know.</p> <p>8 MR. GENTRY: I believe your</p> <p>9 question was in the affirmative, that</p> <p>10 "are" listed, is that what you said, or</p> <p>11 "are not"? I wasn't sure if that was a</p> <p>12 contraction.</p> <p>13 BY MR. VOLHEIM:</p> <p>14 Q. Does Exhibit L contain any accounts that</p> <p>15 are not listed on Exhibit M?</p> <p>16 A. I don't know.</p> <p>17 Q. Okay. Well, can you -- would reviewing</p> <p>18 Exhibit L tell you the answer to that question?</p> <p>19 A. Not necessarily.</p> <p>20 Q. Okay. Why is that?</p> <p>21 A. Because the accounts -- there are a</p> <p>22 different set of account numbers that -- what I have</p> <p>23 in Exhibit L is just a header number, and -- and</p> <p>24 notes, and I don't have the actual trailer numbers</p>
<p style="text-align: right;">Page 40</p> <p>1 that fall under the header number for each of those</p> <p>2 accounts on the list in M.</p> <p>3 Q. Is there a document that would say the</p> <p>4 trailer numbers?</p> <p>5 A. No, not to my knowledge.</p> <p>6 Q. So how would Finance System of Toledo</p> <p>7 know which accounts are tied in with the header</p> <p>8 account?</p> <p>9 MR. GENTRY: You mean the</p> <p>10 particular header account you're talking</p> <p>11 about, right, the record?</p> <p>12 MR. VOLHEIM: Yes.</p> <p>13 THE WITNESS: So it would be</p> <p>14 the -- the account numbers that would be</p> <p>15 associated with the -- the client's</p> <p>16 account number. I would have to look it</p> <p>17 up.</p> <p>18 BY MR. VOLHEIM:</p> <p>19 Q. Would EPNO, Inc., of Toledo have a</p> <p>20 different client account number than Allstar Disposal?</p> <p>21 A. Yes.</p> <p>22 Q. Would those numbers -- would EPNO and</p> <p>23 Allstar's client account numbers be different than</p> <p>24 that of Toledo Clinic, Inc.?</p>	<p style="text-align: right;">Page 41</p> <p>1 A. Yes.</p> <p>2 Q. Would there be header account notes for</p> <p>3 each of those clients regarding my client?</p> <p>4 A. That's -- yes. That's what Exhibit L is.</p> <p>5 Q. Did my client request to be sent the</p> <p>6 correspondence dated January 15th, 2018?</p> <p>7 A. I will have to read through these notes.</p> <p>8 (Pause.)</p> <p>9 THE WITNESS: I do not see that,</p> <p>10 no.</p> <p>11 BY MR. VOLHEIM:</p> <p>12 Q. Okay. So if an account is paid in</p> <p>13 full -- I'll direct your attention to January 15th,</p> <p>14 2018, correspondence, Exhibit M. Would you agree with</p> <p>15 me that there are three different accounts listed on</p> <p>16 this correspondence -- correspondence, which are paid</p> <p>17 in full?</p> <p>18 MR. GENTRY: Object to the</p> <p>19 form. It appears there were two</p> <p>20 questions in one.</p> <p>21 BY MR. VOLHEIM:</p> <p>22 Q. On the Exhibit M correspondence are there</p> <p>23 three different accounts which have been paid in full</p> <p>24 listed?</p>

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<p style="text-align: right;">Page 42</p> <p>1 A. Yes.</p> <p>2 Q. And those three accounts are from three</p> <p>3 different creditors; is that correct?</p> <p>4 A. EPNO, Allstar, and Toledo Clinic, yes.</p> <p>5 Q. If those three accounts were paid in</p> <p>6 full, then why were they listed on the January 15th,</p> <p>7 2018, correspondence?</p> <p>8 A. Because it's giving him an accurate</p> <p>9 description of the account history.</p> <p>10 Q. Is it your testimony that any</p> <p>11 correspondence which Finance System of Toledo sends,</p> <p>12 it will give an update of any accounts that are placed</p> <p>13 with it?</p> <p>14 MR. GENTRY: Objection. Asked</p> <p>15 and answered.</p> <p>16 BY MR. VOLHEIM:</p> <p>17 Q. You can answer.</p> <p>18 MR. GENTRY: Go ahead, Nancy.</p> <p>19 THE WITNESS: You're saying</p> <p>20 "any," so it's very broad and ...</p> <p>21 MR. GENTRY: She already</p> <p>22 testified to this. I'm not --</p> <p>23 MR. VOLHEIM: Boyd, with all</p> <p>24 respect, I'm not interested in your</p>	<p style="text-align: right;">Page 43</p> <p>1 testimony. Thank you.</p> <p>2 BY MR. VOLHEIM:</p> <p>3 Q. Who sent the letter dated January 15th,</p> <p>4 2018?</p> <p>5 A. Who sent it?</p> <p>6 Q. Correct.</p> <p>7 A. It was generated and sent by Finance</p> <p>8 System and our mail service.</p> <p>9 Q. And who is Finance System of Toledo's</p> <p>10 mail service that sent this letter?</p> <p>11 A. Renkim.</p> <p>12 Q. How long has Renkim been the letter</p> <p>13 sender for Finance System of Toledo?</p> <p>14 A. I'm going to say over five years. I</p> <p>15 can't give you a definite.</p> <p>16 Q. Sure. And in that five-year period,</p> <p>17 approximately, has Renkim been the exclusive</p> <p>18 letter-sender of Finance System of Toledo?</p> <p>19 A. Yes.</p> <p>20 Q. Does Renkim send its letters at the</p> <p>21 direction and benefit of Finance System of Toledo?</p> <p>22 A. Yes.</p> <p>23 Q. Does Renkim send -- strike that.</p> <p>24 So it is your testimony that</p>
<p style="text-align: right;">Page 44</p> <p>1 Finance System of Toledo created -- or, excuse me,</p> <p>2 decided what went into the letter dated January 15th,</p> <p>3 2018?</p> <p>4 A. Yes.</p> <p>5 Q. Who at Finance System of Toledo decided</p> <p>6 that?</p> <p>7 A. It's a management decision.</p> <p>8 Q. Okay. Who -- do you know what</p> <p>9 individuals in management would have made that</p> <p>10 decision?</p> <p>11 A. It would have been myself, Amy Pfeiffer,</p> <p>12 and Randy Parker.</p> <p>13 Q. Okay. And what is Mr. Parker's title?</p> <p>14 A. He's the owner.</p> <p>15 Q. Okay. And I do not want to know the</p> <p>16 contents of any communications you would have had with</p> <p>17 an attorney, but did an attorney assist in preparing</p> <p>18 the template used for the January 15th, 2018,</p> <p>19 correspondence?</p> <p>20 A. Rephrase that a little bit for me.</p> <p>21 Q. Sure. I want to be very clear. I do not</p> <p>22 want to know about the substance of any conversations</p> <p>23 that you or Finance System of Toledo had with any</p> <p>24 attorney.</p>	<p style="text-align: right;">Page 45</p> <p>1 A. Uh-huh.</p> <p>2 Q. However, my question is did an attorney</p> <p>3 at any point review the template used for the January</p> <p>4 15th, 2018, correspondence?</p> <p>5 A. Yes.</p> <p>6 Q. Did the attorney review that prior to the</p> <p>7 January 15th, 2018, correspondence being sent?</p> <p>8 A. No.</p> <p>9 Q. Mr. Parker, to your knowledge, is he an</p> <p>10 attorney?</p> <p>11 A. No.</p> <p>12 Q. To your knowledge, does Mr. Parker own</p> <p>13 any -- excuse me. Strike that.</p> <p>14 To your knowledge, does Mr. Parker have</p> <p>15 any certification or special training with regards to</p> <p>16 the FDCPA?</p> <p>17 A. Not to my knowledge.</p> <p>18 Q. Okay. To your knowledge, does -- and,</p> <p>19 again, I apologize if I mispronounce this. Does</p> <p>20 Ms. Pfeiffer, is she an attorney?</p> <p>21 A. No.</p> <p>22 Q. To your knowledge, does Ms. Pfeiffer have</p> <p>23 any advanced training or certification when it comes</p> <p>24 to the Fair Debt Collection Practices Act?</p>

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<p style="text-align: right;">Page 46</p> <p>1 A. Not to my knowledge.</p> <p>2 Q. Would anyone other than yourself,</p> <p>3 Ms. Pfeiffer, or Mr. Parker have reviewed the template</p> <p>4 used to send -- the template used for the January</p> <p>5 15th, 2018, correspondence prior to it being sent?</p> <p>6 A. Let me see if I understand your question.</p> <p>7 Q. Of course.</p> <p>8 A. When we create letters, are you asking if</p> <p>9 someone other than the three of us review them before</p> <p>10 they go to print?</p> <p>11 Q. Yeah. We can start more generally, yes.</p> <p>12 That would be my question.</p> <p>13 A. Okay. Yes, someone does.</p> <p>14 Q. Okay. Who else would review the</p> <p>15 templates before they go to print?</p> <p>16 A. James Nowak.</p> <p>17 Q. Okay. Regarding specifically the</p> <p>18 template used for the January 15th, 2018, letter, did</p> <p>19 anyone other than yourself, Mr. Parker, or</p> <p>20 Ms. Pfeiffer review the template prior to it being</p> <p>21 sent?</p> <p>22 A. I don't know.</p> <p>23 Q. Do you know whether or not Mr. Nowak</p> <p>24 reviewed the template for the January 15th, 2018,</p>	<p style="text-align: right;">Page 47</p> <p>1 letter prior to it being sent?</p> <p>2 A. I wouldn't know.</p> <p>3 Q. Okay. I'm going to ask you to pull out</p> <p>4 what's been pre-marked as Exhibit G, as in "girl."</p> <p>5 A. G.</p> <p>6 Q. G as in "girl."</p> <p>7 (Deposition Exhibit G was</p> <p>8 presented to the witness.)</p> <p>9 THE WITNESS: Okay.</p> <p>10 MR. VOLHEIM: For the record,</p> <p>11 Exhibit G is Defendant Finance System of</p> <p>12 Toledo Produced Accounts Notes for Client</p> <p>13 Allstar Disposal and Recycling.</p> <p>14 BY MR. VOLHEIM:</p> <p>15 Q. Have you seen Exhibit G before today?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. What is Exhibit G?</p> <p>18 A. It is the printout of the Allstar</p> <p>19 Disposal account.</p> <p>20 Q. Okay. When was that account placed with</p> <p>21 Finance System of Toledo?</p> <p>22 A. 5-18 of '15.</p> <p>23 Q. And when was that account satisfied?</p> <p>24 A. That was 7-27 of '17.</p>
<p style="text-align: right;">Page 48</p> <p>1 Q. Okay. And what was the balance on the</p> <p>2 date that this account was assigned?</p> <p>3 A. 157 dollars.</p> <p>4 Q. Okay. How much interest was placed --</p> <p>5 strike that.</p> <p>6 How much interest was on this account</p> <p>7 when it was placed with Finance System of Toledo?</p> <p>8 A. Zero.</p> <p>9 Q. Is it fair to say -- for time</p> <p>10 constraints, is it fair to say that zero dollars in</p> <p>11 interest, attorney fees, court fees, miscellaneous</p> <p>12 fees, contingency fees, all of that would be zero at</p> <p>13 the time of placement with Finance System of Toledo?</p> <p>14 A. Correct.</p> <p>15 Q. Okay. What date was this account -- and</p> <p>16 I think you -- I apologize. I know you stated it, but</p> <p>17 just for clarity, this account was satisfied on July</p> <p>18 27th, 2017?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. When this account was satisfied on</p> <p>21 July 27th, 2017, had any interest, attorney's fees,</p> <p>22 court costs, contingency fees, miscellaneous fees, had</p> <p>23 anything been added to the balance at the time the</p> <p>24 debt was satisfied?</p>	<p style="text-align: right;">Page 49</p> <p>1 A. No.</p> <p>2 Q. Okay. So in the approximately two years</p> <p>3 and two months that this account -- from the time this</p> <p>4 account was placed with Finance System of Toledo to</p> <p>5 the time it was satisfied, nothing had been added to</p> <p>6 the balance?</p> <p>7 A. Correct.</p> <p>8 Q. Okay. When this account was placed by</p> <p>9 Allstar Disposal, did it direct Finance System of</p> <p>10 Toledo as to whether or not it should collect</p> <p>11 interest?</p> <p>12 A. I don't know.</p> <p>13 Q. Is there a written agreement between</p> <p>14 Allstar Disposal and Recycling and Finance System of</p> <p>15 Toledo that would cover collection of this debt?</p> <p>16 A. No.</p> <p>17 Q. Was there any direction or communication,</p> <p>18 whether verbal or not -- excuse me, whether written,</p> <p>19 verbal, or otherwise, as to how Finance System of</p> <p>20 Toledo should collect this Allstar Disposal and</p> <p>21 Recycling account?</p> <p>22 A. No.</p> <p>23 Q. At the time that Finance System of Toledo</p> <p>24 sent the January 15th, 2018, correspondence, had it</p>

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1 added any interest or other fees regarding the Allstar
2 Disposal account?
3 **A. No.**
4 **Q.** At the time it sent the January 15, 2018,
5 correspondence, did it have the legal ability to add
6 any interest or other fees?
7 **A. I don't know.**
8 **MR. GENTRY:** Objection as to
9 legal ability.
10 **BY MR. VOLHEIM:**
11 **Q.** At the time Finance System of Toledo sent
12 the January 15, 2018, correspondence, did it have any
13 intention of adding any interest or other charges of
14 any kind to the Allstar Disposal account?
15 **MR. GENTRY:** Objection as to
16 the "it." I think "it" as the subject is
17 vague.
18 **BY MR. VOLHEIM:**
19 **Q.** Did you understand my question, ma'am?
20 **A. Can you say it over?**
21 **Q.** Sure. Of course. At the time
22 Finance System of Toledo sent the January 15th, 2018,
23 correspondence, did Finance System of Toledo have any
24 intention of adding -- excuse me, of collecting

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1 Go ahead.
2 **THE WITNESS:** The client settled
3 that account in full so ...
4 **BY MR. VOLHEIM:**
5 **Q.** Okay. So does Finance System of Toledo
6 collect debts that are resolved in full?
7 **A. No.**
8 **Q.** Okay. And so the Allstar Disposal debt
9 was resolved in full, correct?
10 **A. Correct.**
11 **Q.** Okay. And it was resolved in full by the
12 time the January 15th, 2018, correspondence was sent?
13 **A. Correct.**
14 **Q.** Okay. So my question, again, at the time
15 that correspondence was sent, did Finance System of
16 Toledo have any intent of collecting any further
17 amount, whether for balance, interest, attorney fees,
18 or other from my client?
19 **A. No.**
20 **MR. GENTRY:** Objection. Asked
21 and answered.
22 **BY MR. VOLHEIM:**
23 **Q.** For the record, can you repeat your
24 answer, please?

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1 interest or other fees regarding the Allstar Disposal
2 account against my client?
3 **A. I'm not sure.**
4 **Q.** Okay. The account was paid in full --
5 excuse me, strike that.
6 The account was satisfied in full,
7 correct?
8 **A. Yes.**
9 **Q.** So you're not sure if Finance System of
10 Toledo was going to collect any amount on this account
11 going forward?
12 **MR. GENTRY:** Objection. That
13 wasn't the question.
14 But you can answer that
15 question.
16 **THE WITNESS:** Zero is zero,
17 so ...
18 **BY MR. VOLHEIM:**
19 **Q.** So can I take from your answer that
20 Finance System of Toledo has no intention of
21 collecting anything further on the Allstar Disposal
22 account?
23 **MR. GENTRY:** Objection as to
24 form when you use the word "further."

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1 **A. It -- no.**
2 **Q.** I'm going to ask you to turn to what's
3 been pre-marked Exhibit I.
4 (Deposition Exhibit I was
5 presented to the witness.)
6 **THE WITNESS:** Okay. Can we take
7 a few-minute break here?
8 **MR. VOLHEIM:** Of course, how
9 long would you like?
10 **THE WITNESS:** 10 minutes, 5, 10
11 minutes.
12 **MR. VOLHEIM:** That sounds great.
13 We'll pick back up at 12:35. How about
14 that?
15 **THE WITNESS:** Agree. Thank you.
16 (A brief recess was had.)
17 **BY MR. VOLHEIM:**
18 **Q.** We just took a break. During that
19 break -- I don't want to know the substance of any
20 conversation you had, but did you speak to anybody
21 about your testimony here today?
22 **A. No.**
23 **Q.** Okay. And you understand that we are
24 back under oath; is that correct?

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<p>Page 54</p> <p>1 A. Yes.</p> <p>2 Q. Okay. So where we left off, I think I</p> <p>3 was asking you to take a look at what's been</p> <p>4 pre-marked Exhibit I as in "igloo."</p> <p>5 Could you go ahead and pull that document</p> <p>6 out.</p> <p>7 A. Yes, I have it here.</p> <p>8 Q. Great. And have you seen this document</p> <p>9 before today?</p> <p>10 A. Yes.</p> <p>11 MR. VOLHEIM: For the record,</p> <p>12 Exhibit I is Defendant Finance System of</p> <p>13 Toledo Produced Accounts Notes for Toledo</p> <p>14 Clinic, Inc., Reference No. 27962730001.</p> <p>15 BY MR. VOLHEIM:</p> <p>16 Q. Is this an account that was placed by</p> <p>17 Toledo Clinic with Finance System to collect with</p> <p>18 regards to my client?</p> <p>19 A. Yes.</p> <p>20 Q. And what was the date of placement?</p> <p>21 A. May 6th of '16.</p> <p>22 Q. Okay. And what was the balance when this</p> <p>23 was first placed with Finance System of Toledo?</p> <p>24 A. \$768.93.</p> <p>Page 56</p> <p>1 A. Possibly, but I don't -- let me look.</p> <p>2 Q. I guess I'll direct your attention</p> <p>3 through these account notes, and I believe it's on the</p> <p>4 same page. There is a couple of entries from</p> <p>5 10-24-2017, about the middle of the last page.</p> <p>6 Do you see those entries?</p> <p>7 A. Let me flip there. 10-24 of '17, yes.</p> <p>8 Q. Okay. Does anything in those two entries</p> <p>9 tell you who made the payment?</p> <p>10 A. No.</p> <p>11 Q. Okay. So I know we established this on</p> <p>12 the other accounts, but just for clarity, at the date</p> <p>13 that this account was placed with Finance System of</p> <p>14 Toledo, there was no interest, attorney fees, court</p> <p>15 costs, judgment interests, miscellaneous fees, or</p> <p>16 contingency fees at placement; is that correct?</p> <p>17 A. That is correct.</p> <p>18 Q. Okay. And as the balance currently sits,</p> <p>19 to your knowledge, have any of those fees that I just</p> <p>20 listed been added to the balance?</p> <p>21 A. Not to my knowledge.</p> <p>22 Q. Okay. Directing your attention back to</p> <p>23 Exhibit M, with respect to this account, which would</p> <p>24 be the third from the -- which would be the middle</p>	<p>Page 55</p> <p>1 Q. Okay. And is there -- as we currently</p> <p>2 sit today, is still there a balance on this account?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And what is that balance?</p> <p>5 A. \$734.16.</p> <p>6 Q. Okay. So the balance is slightly less</p> <p>7 than when it was assigned to Finance System; is that</p> <p>8 correct?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. And is that the result of a</p> <p>11 payment being made?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. When was the payment made?</p> <p>14 A. 10-24-17.</p> <p>15 Q. Okay. And do you know who paid that</p> <p>16 payment?</p> <p>17 A. I can tell you it was made to Finance</p> <p>18 System, but, no, I do not know who made it.</p> <p>19 Q. Okay. So you're not aware whether or</p> <p>20 not, excuse me, my client was the one who made that</p> <p>21 payment?</p> <p>22 A. No, I don't really know.</p> <p>23 Q. Okay. Would the party who made the</p> <p>24 payment be listed in these account notes?</p> <p>Page 57</p> <p>1 account, at the time the January 15th, 2018, letter</p> <p>2 was sent, what was the principal balance?</p> <p>3 A. 734.16.</p> <p>4 Q. Okay. And how much interest was added at</p> <p>5 the time the letter was sent?</p> <p>6 A. Zero.</p> <p>7 Q. And how much under the category of Other</p> <p>8 was Finance System of Toledo seeking to collect?</p> <p>9 A. As a snapshot of this letter?</p> <p>10 Q. Correct.</p> <p>11 A. 734.16 on that account.</p> <p>12 Q. Okay. From January 15th, 2018, to the</p> <p>13 current, has any additional amount been added to the</p> <p>14 value of \$734.16?</p> <p>15 A. No.</p> <p>16 Q. At the time the January 15th, 2018,</p> <p>17 correspondence was sent, did Finance System of Toledo</p> <p>18 intend to add any interest with regards to this</p> <p>19 account?</p> <p>20 A. This is a snapshot at that time, so no.</p> <p>21 Q. Did Finance System of Toledo, at the time</p> <p>22 this letter was sent, intend to add any other charges</p> <p>23 when this correspondence was sent?</p> <p>24 A. Again, it's a snapshot at this time of</p>
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<p style="text-align: right;">Page 58</p> <p>1 zero.</p> <p>2 Q. So is the answer no?</p> <p>3 A. No.</p> <p>4 Q. I'm sorry. Just for clarity, you're</p> <p>5 agreeing with me that the answer is no?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. I think we got that clear.</p> <p>8 So with respect -- with respect to this</p> <p>9 letter, would you agree with me that the term</p> <p>10 "principal" is pretty clear as to what the meaning of</p> <p>11 the word "principal" is?</p> <p>12 MR. GENTRY: Objection.</p> <p>13 Go ahead.</p> <p>14 THE WITNESS: Yeah, to me.</p> <p>15 BY MR. VOLHEIM:</p> <p>16 Q. Okay. What does it mean to you?</p> <p>17 A. It means that's the balance due.</p> <p>18 Q. Okay. Next column over, interest, what</p> <p>19 does that mean to you?</p> <p>20 A. Interest. It means additional monies.</p> <p>21 Q. Okay. Next column over, what does the</p> <p>22 term "Other" mean to you?</p> <p>23 A. It could be anything else.</p> <p>24 Q. It could be anything else?</p>	<p style="text-align: right;">Page 59</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Is there anything in this</p> <p>3 correspondence from January 15th, 2018, which defines</p> <p>4 what the word "Other" entails?</p> <p>5 A. No, it doesn't.</p> <p>6 Q. I'm sorry. Go ahead. I did not mean to</p> <p>7 cut you off.</p> <p>8 A. No, no. That's fine. Go ahead.</p> <p>9 Q. Okay. I believe your answer was no,</p> <p>10 correct?</p> <p>11 A. Correct.</p> <p>12 Q. Okay. How would a consumer receiving</p> <p>13 this letter dated January 15th, 2018, know what was</p> <p>14 comprised in the word "Other"?</p> <p>15 A. It's zero.</p> <p>16 MR. GENTRY: Objection.</p> <p>17 Go ahead, Nancy. Go ahead.</p> <p>18 THE WITNESS: It's zero. Just</p> <p>19 "zero" means zero.</p> <p>20 BY MR. VOLHEIM:</p> <p>21 Q. Okay. Is there anything in this</p> <p>22 correspondence which states what could be added under</p> <p>23 the category of Other?</p> <p>24 A. No.</p>
<p style="text-align: right;">Page 60</p> <p>1 Q. At the time this correspondence was</p> <p>2 sent -- strike that.</p> <p>3 With regards to this account ending in</p> <p>4 001 -- and actually, strike that.</p> <p>5 With regards to the account, client</p> <p>6 reference number 27962730001, was there -- is there or</p> <p>7 was there an agreement between Finance System of</p> <p>8 Toledo and Toledo Clinic, Inc., regarding the</p> <p>9 collection of this account?</p> <p>10 MR. GENTRY: You mean written</p> <p>11 agreement or just any agreement?</p> <p>12 MR. VOLHEIM: Thank you. Let's</p> <p>13 start with written.</p> <p>14 BY MR. VOLHEIM:</p> <p>15 Q. Was there any written agreement which</p> <p>16 would cover the collection of this account?</p> <p>17 A. No.</p> <p>18 Q. Is there any written agreement or</p> <p>19 correspondence in which Finance System of Toledo</p> <p>20 directed -- strike that. I'm confusing my parties.</p> <p>21 Is there any correspondence, whether</p> <p>22 written or otherwise, in which Finance System of</p> <p>23 Toledo was instructed by Toledo Clinic, Inc., on how</p> <p>24 to collect on this debt?</p>	<p style="text-align: right;">Page 61</p> <p>1 A. No.</p> <p>2 Q. Did Toledo Clinic, Inc., instruct</p> <p>3 Finance System of Toledo to collect any interest on</p> <p>4 this account?</p> <p>5 A. Not to my knowledge.</p> <p>6 Q. To your knowledge, did Toledo Clinic,</p> <p>7 Inc., instruct Finance System of Toledo to collect any</p> <p>8 attorney fees, court costs, judgment interest,</p> <p>9 miscellaneous fees, or other fees with regards to this</p> <p>10 account?</p> <p>11 A. Not to my knowledge.</p> <p>12 Q. Is there anyone other than you that would</p> <p>13 have knowledge of whether or not Finance System of</p> <p>14 Toledo was instructed to collect those amounts?</p> <p>15 A. No.</p> <p>16 Q. Were you instructed to collect those</p> <p>17 amounts by Toledo Clinic, Inc.?</p> <p>18 A. The 734.16?</p> <p>19 Q. I'm sorry. Yes, other than the 734.16,</p> <p>20 were you instructed by Toledo Clinic, Inc., to collect</p> <p>21 any other amount?</p> <p>22 A. No.</p> <p>23 Q. Okay. And I'll try to make this quick.</p> <p>24 If you could pull out what's been pre-marked as</p>

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<p>Page 62</p> <p>1 Exhibit H. 2 (Deposition Exhibit H was 3 presented to the witness.) 4 THE WITNESS: Okay. 5 MR. VOLHEIM: For the record, 6 Exhibit H is entitled Defendant Finance 7 System of Toledo Produced Account Notes 8 for Toledo Clinic, Inc., Reference 9 No.28093807001. 10 BY MR. VOLHEIM: 11 Q. Have you ever seen this document before 12 today? 13 A. Yes. 14 Q. Does this document reflect an account 15 that was placed by Toledo Clinic with Finance System 16 of Toledo to collect with regards to my client? 17 A. Yes. 18 Q. What was the date of placement? 19 A. 6-18 of '16. 20 Q. At the time this account was placed, what 21 was the balance? 22 A. \$69.13. 23 Q. Was this account satisfied? 24 A. Yes.</p>	<p>Page 63</p> <p>1 Q. Okay. Do you know who this account was 2 satisfied by? 3 A. No, I do not. 4 Q. It looks like -- am I reading it 5 correctly that the account was satisfied on July 27th, 6 2017? 7 A. I believe it was 8-2 of -- well, yes. 8 7-27 of '17, correct. 9 Q. Okay. Directing your attention to the 10 top of that page, or towards the top of that page, is 11 there anything in these account notes that would state 12 who made the payment on July 27th, 2017? 13 A. No. 14 Q. Okay. At the time this account was 15 satisfied on July 27th, 2017, what was the balance? 16 A. \$69.13. 17 Q. Okay. And that was the same balance that 18 was put with Finance System of Toledo at placement on 19 June 18th, 2017; is that correct? 20 A. Say that again. I'm sorry. 21 Q. Sure. The balance that was satisfied on 22 July 27th, 2017, of \$69.13, is that the same balance 23 amount that was placed with Finance System of Toledo 24 on June 18th, 2016?</p>
<p>Page 64</p> <p>1 A. Yes. 2 Q. Okay. And as we've done on the other 3 ones, I just want to go through. 4 At the time this account was placed, 5 Finance System of Toledo was not seeking collection on 6 any interest, attorney fees, court costs, 7 miscellaneous fees, or other fees; is that correct? 8 A. Correct. 9 Q. And at the time -- directing your 10 attention back to the Exhibit M, at the time the 11 January 15th, 2018, correspondence was sent, did 12 Finance System of Toledo have any intent to collect 13 any money from my client with regards to this account? 14 A. It's a zero balance. No. 15 Q. So is -- asking you yes or no, at the 16 time the correspondence was sent regarding this 17 account, did Finance System of Toledo have any 18 intention of collecting any money? 19 A. No. On that particular account. 20 Q. Okay. Directing your attention to page 1 21 of the January 15th, 2018, correspondence, would you 22 look at the bottom of that correspondence? 23 Right above the -- there is a sentence 24 which says, "This is an attempt to collect a debt.</p>	<p>Page 65</p> <p>1 Any information obtained will be used for that 2 purpose." 3 Do you agree with my reading of that 4 statement? 5 A. Yes. 6 Q. When Finance System of Toledo sent this 7 statement dated January 15th, 2018, was it attempting 8 to collect a debt from my client? 9 A. Yes. 10 Q. Finally, directing your attention to -- 11 I'm going to ask you to take a look at what's been 12 pre-marked as Exhibit J, as in "John." 13 (Deposition Exhibit J was 14 presented to the witness.) 15 THE WITNESS: Okay. 16 MR. VOLHEIM: For the record, 17 Exhibit J is Defendant Finance System of 18 Toledo Produced Account Notes for Toledo 19 Clinic, Inc., reference No. 200095786160 20 1954. 21 BY MR. VOLHEIM: 22 Q. Have you seen this document before today? 23 A. Yes. 24 Q. Directing your attention to the top of</p>

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1 this document, this document -- excuse me.
2 Are these the account notes for a debt
3 placed with Finance System of Toledo by the Toledo
4 Clinic?
5 **A. Yes.**
6 **Q.** And the date of the placement was what,
7 please?
8 **A. May 10th of 2017.**
9 **Q.** Okay. Directing your attention to the
10 top right-hand corner of that, it says page 9. Are
11 there other pages associated with this account note?
12 **A. I don't know.**
13 (Pause.)
14 BY MR. VOLHEIM:
15 **Q.** I just want to make sure you know I'm
16 waiting for you. You can take as much time as you
17 need. I'm just waiting for you.
18 **A. Oh.**
19 **Q.** I was worried we were waiting for each
20 other.
21 So is it your testimony that you don't
22 know if there are prior pages?
23 **A. Correct.**
24 **Q.** Okay.

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1 I.
2 **MR. VOLHEIM:** Jim, why don't we
3 go off the record to make the court
4 reporter's job easier.
5 **MR. NOWAK:** Okay.
6 (Discussion had off the record.)
7 BY MR. VOLHEIM:
8 **Q.** When we went off the record, we were
9 looking at Exhibit J. What was the balance of the --
10 I'm sorry, the date of placement for this account?
11 Was it May 10th, 2017?
12 **A. Correct.**
13 **Q.** Okay. What was the balance at that time?
14 **A. \$41.14.**
15 **Q.** Okay. And as we've done, just for the
16 last time, at the time the account was placed with
17 Finance System of Toledo there was no interest,
18 attorney fees, court costs, miscellaneous, or other
19 fees being sought.
20 **A. Correct.**
21 **Q.** Now, does this account remain
22 outstanding, to your knowledge?
23 **A. Yes.**
24 **Q.** Okay. Directing your attention to the

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1 **MR. VOLHEIM:** Counsel, we're
2 going to want some clarity as to all of
3 the account notes. I think they all
4 start, or at least most of them start on
5 a page number that is not 1. I'm going
6 to need some clarity regarding this.
7 **MR. NOWAK:** This is
8 Attorney Nowak. It appears that all the
9 Toledo Clinic accounts, and I'm
10 speculating here, the first page, going
11 through all the notes, starts at 1, and
12 then it seems to move forward. The
13 Allstar seems to be its own set of page
14 numbers. And that's just me paging
15 through the exhibits.
16 **MR. VOLHEIM:** That doesn't --
17 and I know you're just speculating,
18 James, so I appreciate it.
19 But that doesn't seem to gibe
20 when you look at Exhibit H and Exhibit I
21 in conjunction.
22 **MR. NOWAK:** Well, it appears
23 that if we look at Exhibit F, it goes
24 from pages 1 through 6, and then Exhibit

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1 bottom of that main page, it looks like there was a
2 payment made on July 27th, 2017, that was reversed; is
3 that correct?
4 **A. Correct.**
5 **Q.** Do you have any knowledge as to either
6 why these account notes reflected a payment or why
7 that payment was reversed?
8 **A. No, I do not.**
9 **Q.** Okay. But it looks like from these
10 account notes the payment was made and reversed in the
11 same day.
12 **A. Correct.**
13 **Q.** Okay. Directing your attention back to
14 Exhibit M, as in Mary, the correspondence from January
15 15th, 2018, looking at the bottom of the page, the
16 account that we were just looking at in Exhibit J, is
17 that the account that's reflected at the bottom -- at
18 the bottom of the page there?
19 **A. Correct.**
20 **Q.** Okay. And at the time that this
21 correspondence was sent, no payment had been made on
22 this account; is that correct?
23 **A. Correct.**
24 **Q.** Okay. At the time that this

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<p style="text-align: right;">Page 70</p> <p>1 correspondence was sent, did Finance System of Toledo</p> <p>2 have any intent to add interest to this account?</p> <p>3 A. Not at this time. It's again ...</p> <p>4 Q. Okay. At the time that this</p> <p>5 correspondence was sent, did Finance System of Toledo</p> <p>6 have any intent to add any other fees?</p> <p>7 A. No.</p> <p>8 Q. And I belief with regards to interest,</p> <p>9 you stated that not at this time did Finance System of</p> <p>10 Toledo have any intention of adding any interest; is</p> <p>11 that correct?</p> <p>12 A. This is a snapshot of the account at that</p> <p>13 time.</p> <p>14 Q. Since this time, has Finance System of</p> <p>15 Toledo added any interest, attorney fees, court costs,</p> <p>16 miscellaneous fees, have they added anything to the</p> <p>17 balance of this account?</p> <p>18 A. No.</p> <p>19 Q. And for clarity, is there any written</p> <p>20 correspondence or document which governs how the</p> <p>21 Toledo Clinic, Inc., wanted Finance System of Toledo</p> <p>22 to collect this account?</p> <p>23 A. No.</p> <p>24 Q. Did the Toledo Clinic instruct at any</p>	<p style="text-align: right;">Page 71</p> <p>1 point Finance System of Toledo to collect interest on</p> <p>2 this account?</p> <p>3 A. I don't know.</p> <p>4 Q. Would anyone else know --</p> <p>5 A. No.</p> <p>6 Q. Other than yourself -- I'm sorry, I</p> <p>7 didn't mean to cut you off.</p> <p>8 A. No. That's okay. No.</p> <p>9 Q. Okay. To your knowledge, were you ever</p> <p>10 directed by the Toledo Clinic, Inc., to collect</p> <p>11 interest with regards to this account?</p> <p>12 A. Not to my knowledge, no.</p> <p>13 Q. Okay. Were you instructed by the Toledo</p> <p>14 Clinic, Inc., to collect anything other than the</p> <p>15 balance of 41.14 on this account?</p> <p>16 A. At the time of placement and -- 41.14.</p> <p>17 Q. And through -- from the time of placement</p> <p>18 through when we currently sit here today, have you</p> <p>19 been instructed by Finance System -- excuse me.</p> <p>20 Strike that. Sorry.</p> <p>21 From the time of placement to right now,</p> <p>22 as you sit here today, have you been instructed by the</p> <p>23 Toledo Clinic to collect any amounts other than 41.14</p> <p>24 with regards to this account?</p>
<p style="text-align: right;">Page 72</p> <p>1 A. No.</p> <p>2 MR. VOLHEIM: Okay. If we can</p> <p>3 go on break for about five minutes, that</p> <p>4 may be all I have, but let me review my</p> <p>5 notes, and we'll come back.</p> <p>6 Actually, if you guys just want</p> <p>7 to wait around, it probably will only</p> <p>8 take me a couple minutes.</p> <p>9 THE WITNESS: Okay.</p> <p>10 (Pause.)</p> <p>11 MR. VOLHEIM: There is one more</p> <p>12 exhibit that I want to go through. I'm</p> <p>13 going to ask -- and you don't need to go</p> <p>14 through this line by line.</p> <p>15 I'm going to ask the court</p> <p>16 reporter to hand you what's been</p> <p>17 pre-marked Exhibit C, as in "cat."</p> <p>18 (Deposition Exhibit C was</p> <p>19 presented to the witness.)</p> <p>20 MR. VOLHEIM: Okay. For the</p> <p>21 record, Exhibit C is Finance System of</p> <p>22 Toledo Responses to Plaintiff's First Set</p> <p>23 of Discovery Requests.</p> <p>24 BY MR. VOLHEIM:</p>	<p style="text-align: right;">Page 73</p> <p>1 Q. Have you seen this document before today?</p> <p>2 A. Yes.</p> <p>3 Q. Did you participate in the answers that</p> <p>4 are contained in this document?</p> <p>5 A. Yes.</p> <p>6 Q. Please direct your attention to No. 5 on</p> <p>7 page 2.</p> <p>8 A. Uh-huh.</p> <p>9 Q. Let me know when you're there.</p> <p>10 A. Oh, I'm there.</p> <p>11 Q. I'm sorry. This is a request to admit.</p> <p>12 In it Finance System of Toledo was asked to admit that</p> <p>13 the collection letters you sent to plaintiff are form</p> <p>14 letters.</p> <p>15 Finance System of Toledo's answer was,</p> <p>16 "Admitted."</p> <p>17 As you sit here today, is there anything</p> <p>18 that you would change about that answer?</p> <p>19 A. No.</p> <p>20 Q. Okay. Directing your attention to --</p> <p>21 there are some numbers at the bottom of the document.</p> <p>22 I'm going to ask you to flip to page 6.</p> <p>23 A. Okay.</p> <p>24 Q. I'm specifically going to direct your</p>

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<p style="text-align: right;">Page 74</p> <p>1 attention to No. 9.</p> <p>2 In the response to No. 9, in part,</p> <p>3 Finance System of Toledo stated, "Defendant does not</p> <p>4 have copies of the actual written correspondence it</p> <p>5 sent to Plaintiff."</p> <p>6 To the best of your knowledge, is that</p> <p>7 answer still correct?</p> <p>8 A. Yes.</p> <p>9 Q. So Finance System of Toledo does not</p> <p>10 retain a copy of the specific correspondence that it</p> <p>11 sends to an individual consumer; is that correct?</p> <p>12 A. Correct.</p> <p>13 Q. Does Finance System of Toledo have in its</p> <p>14 possession a copy of the January 15th, 2018,</p> <p>15 correspondence?</p> <p>16 A. Yes, now.</p> <p>17 Q. Okay. Is that the copy that was provided</p> <p>18 by my client?</p> <p>19 A. Correct, yes.</p> <p>20 Q. Okay. Other than what was provided by my</p> <p>21 client, does Finance System of Toledo have a copy of</p> <p>22 the correspondence dated January 15th, 2018?</p> <p>23 A. No.</p> <p>24 Q. Okay. To your knowledge, does Renkim</p>	<p style="text-align: right;">Page 75</p> <p>1 Corporation -- and Ms. Court Reporter, that's spelled</p> <p>2 R-e-n-k-i-m.</p> <p>3 To your knowledge, does Renkim have a</p> <p>4 copy of the correspondence dated January 15th, 2018?</p> <p>5 A. I would have no idea.</p> <p>6 Q. Did Finance System of Toledo ask Renkim</p> <p>7 if they had a copy of this correspondence?</p> <p>8 A. No.</p> <p>9 Q. If Renkim had a copy of this</p> <p>10 correspondence, would Finance System of Toledo be</p> <p>11 entitled to that?</p> <p>12 A. I would assume so.</p> <p>13 Q. Do you have any reason to doubt that the</p> <p>14 January 15, 2018, correspondence in front of you,</p> <p>15 pages 1 and 2, are not a true -- excuse me. Strike</p> <p>16 that.</p> <p>17 With regards to Exhibit M and the</p> <p>18 correspondence from January 15th, 2018, do you believe</p> <p>19 this is a true and accurate and complete copy of that</p> <p>20 correspondence?</p> <p>21 A. It appears so, yes.</p> <p>22 Q. Do you have any reason to believe that</p> <p>23 this correspondence has been altered in any way?</p> <p>24 A. No.</p>
<p style="text-align: right;">Page 76</p> <p>1 MR. VOLHEIM: Okay. That is all</p> <p>2 the questions I have subject to whatever</p> <p>3 your counsel may ask you. I sincerely</p> <p>4 appreciate your time here this morning</p> <p>5 and afternoon.</p> <p>6 MR. GENTRY: Nathan, this is</p> <p>7 Boyd. If you will give Jim and I a</p> <p>8 couple minutes, I would like to consult</p> <p>9 with him to see if we will ask any</p> <p>10 questions on the record.</p> <p>11 MR. VOLHEIM: Okay.</p> <p>12 MR. GENTRY: All right. Thanks.</p> <p>13 (Discussion had off the record.)</p> <p>14 MR. NOWAK: I think the speaker</p> <p>15 is open. I think we're back on the</p> <p>16 record.</p> <p>17 MR. VOLHEIM: This is Nate. I'm</p> <p>18 here.</p> <p>19 MR. NOWAK: Boyd, are you there?</p> <p>20 MR. GENTRY: Boyd Gentry.</p> <p>21 MR. NOWAK: Okay.</p> <p>22 MR. GENTRY: Nathan, we're back.</p> <p>23 I'm back. Are you there, Nathan?</p> <p>24 MR. VOLHEIM: I'm here.</p>	<p style="text-align: right;">Page 77</p> <p>1 MR. GENTRY: Okay. We have no</p> <p>2 further questions. We will not be</p> <p>3 questioning the witness.</p> <p>4 I would like to go on the record</p> <p>5 and have the court reporter state the</p> <p>6 exhibits you have and that you'll keep</p> <p>7 custody of.</p> <p>8 (Discussion had off the record.)</p> <p>9 MR. GENTRY: This is</p> <p>10 Boyd Gentry, counsel for defendant. The</p> <p>11 exhibits that were used in the deposition</p> <p>12 included A, B, C, F, G, H, I, J, L, and</p> <p>13 M, as in "Mary," and I believe that is</p> <p>14 all the exhibits. We would ask that the</p> <p>15 court reporter hang on to the originals</p> <p>16 there, and if anyone needs them, we can</p> <p>17 order them from the court reporter.</p> <p>18 MR. VOLHEIM: This is Nathan</p> <p>19 Volheim for the plaintiff.</p> <p>20 And Boyd, for the record, you do</p> <p>21 not have any further questions of the</p> <p>22 witness?</p> <p>23 MR. GENTRY: Correct. We have</p> <p>24 no questions.</p>

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<p>Page 78</p> <p>1 We will reserve signature. 2 THE COURT REPORTER: Mr. 3 Volheim, would you like to order the 4 transcript? 5 MR. VOLHEIM: Yes. Regarding 6 the order, it would be electronic only, 7 and we do not need the exhibits. 8 THE COURT REPORTER: Mr. Gentry 9 or Mr. Nowak, would you like a copy of 10 the transcript? 11 MR. GENTRY: I believe we will. 12 You can send it to Jim's office. 13 THE COURT REPORTER: Would you 14 like scanned copies of exhibits? 15 MR. NOWAK: No. 16 MR. VOLHEIM: Do we need to do 17 anything else, counsel? 18 MR. GENTRY: I don't think so. 19 I do not believe we do. 20 (Deposition concluded and 21 witness excused at 1:30 p.m.) 22 (Signature reserved.) 23 --- 24</p> <p>Page 80</p> <p>1 C E R T I F I C A T E 2 3 I, Casey G. Schreiner, a Notary Public in and 4 for the State of Ohio, duly commissioned and 5 qualified, do hereby certify that the within-named 6 witness was by me first duly sworn to tell the truth, 7 the whole truth, and nothing but the truth in the 8 cause aforesaid; that the testimony then given was by 9 me reduced to stenotype in the presence of said 10 witness and afterwards transcribed; that the foregoing 11 is a true and correct transcription of the testimony 12 so given as aforesaid. 13 I do further certify that this deposition was 14 taken at the time and place in the foregoing caption 15 specified. 16 I do further certify that I am not a 17 relative, employee of or attorney for any of the 18 parties in this action; that I am not a relative or 19 employee of an attorney of any of the parties in this 20 action; that I am not financially interested in this 21 action, nor am I or the court reporting firm with 22 which I am affiliated under a contract as defined in 23 the applicable civil rule. 24</p>	<p>Page 79</p> <p>1 SIGNATURE PAGE 2 3 Date of Deposition: October 22, 2019 4 5 Correction page(s) enclosed? Yes___ No___ 6 7 How many correction pages? _____ 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> <p>_____</p> <p>NANCY QUIROGA Date</p> <p>--- --</p> <p>Page 81</p> <p>1 2 IN WITNESS WHEREOF, I have hereunto set 3 my hand and affixed my seal of office at Toledo, Ohio 4 on this 11th day of November, 2019. 5 6 <i>Casey G. Schreiner</i> 7 8 CASEY G. SCHREINER, RMR-RDR 9 Notary Public 10 in and for the State of Ohio 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p> <p>My Commission expires December 26, 2021.</p>
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Nancy Quiroga October 22, 2019

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Exhibit A

Amended Notice of Deposition

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

ROBIE GASTON,

Plaintiff,

v.

3:18-cv-02652

FINANCE SYSTEM OF TOLEDO, INC.,

Defendant.

AMENDED NOTICE OF DEPOSITION

To: Finance System of Toledo, Inc.
c/o Law Office of Boyd W. Gentry
4031 Colonel Glenn Highway
Beavercreek, OH 45431
zelllott@boydgentrylaw.com
bgentry@boydgentrylaw.com

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, the undersigned will take the deposition by oral examination of certain designated representative(s) of the following party on the date and time indicated below:

Finance System of Toledo, Inc. (“FST”)

October 22, 2019 at 10:00 a.m. CST

The deposition will take place telephonically from 2500 S. Highland Avenue, Suite 200, Lombard, Illinois 60148 on the one end and a location in Toledo, Ohio on the other. **We will provide that location soon.** The deposition will be recorded by stenographic means. The deposition will continue until completed. The deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure.

FST is hereby notified of its duty, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, to designate one or more officers, directors, agents or other persons who will testify on its behalf and, for each person so designated, to set forth the matters upon which the person will testify. Definitions for all applicable terms below are given the same meaning as in Plaintiff's Interrogatories to FST issued on April 23, 2019.

1. FST's relationship with Toledo Clinic, Inc. as it relates to Plaintiff.
2. FST's relationship with Allstar Disposal as it relates to Plaintiff.
3. FST's relationship with EPNO of Toledo, Inc. as it relates to Plaintiff.
4. In depth discussion regarding the allegations against FST as set forth in Plaintiff's Complaint.
5. In depth discussion on any correspondence FST caused to be sent to Plaintiff.
6. In depth discussion on the identity and duties of any third-party service providers employed by FST to assist in sending correspondences to Plaintiff.
7. Claims and defenses of the parties, the parties' discovery requests and responses, and all documents disclosed, produced, or required to be produced by either party in connection with the case.
8. In depth discussion on FST's collections systems used in conjunction with Plaintiff.
9. In depth discussion on all documentation methods, if any, whether computerized, manual, or other, of all activities undertaken by FST or their employees related to the collection of Plaintiff's account.
10. In depth discussion on FST's methods of communications as they relate to delinquent consumer accounts.
11. In depth discussion on FST's training of employees in its collections department.
12. In depth discussion on all documents produced to Plaintiff by FST in the course of this case.

13. In depth discussion on all policy, procedure and training manuals, memoranda and other writings regarding collection activities of FST which were in effect and used for a period of five (5) years prior to the date of this notice to the present relating to Plaintiff's account.
14. The relationship between FST and Plaintiff.
15. FST's Answer to Plaintiff's Complaint.
16. FST's affirmative defense(s) as raised in its Answer to Plaintiff's Complaint.
17. FST's responses to Plaintiff's Interrogatories.
18. FST's responses to Plaintiff's Requests for Production.
19. FST's responses to Plaintiff's Requests for Admission.
20. FST's training process for training employees to be compliant with state and federal laws.
21. In depth discussion on the procedures employed by FST to comply with the Fair Debt Collection Practices Act.
22. The process and procedures that govern the drafting of any correspondences sent to Plaintiff by FST.
23. The review process of any correspondence sent to Plaintiff.

s/ Nathan C. Volheim
Nathan C. Volheim, Esq. #6302103
Counsel for Plaintiff
Sulaiman Law Group, Ltd.
2500 South Highland Ave, Suite 200
Lombard, Illinois 60148
(630) 630-568-3056 (phone)
(630) 575-8188 (fax)
nvolheim@sulaimanlaw.com

CERTIFICATE OF SERVICE

The undersigned, one of the attorneys for Plaintiff, certifies that on September 23, 2019, he caused a copy of the foregoing *Amended* Notice of Deposition, to be served by electronic mail on:

James S. Nowak
4808 North Summit Street
Toledo, OH 43611
joffice@bex.netjoffice

Law Offices of Boyd W. Gentry
Attn: Boyd W. Gentry
Attn: James S. Nowak
4031 Colonel Glenn Highway
Beavercreek, OH 45431
zellott@boydgentrylaw.com
bgentry@boydgentrylaw.com

s/ Nathan C. Volheim
Nathan C. Volheim
Counsel for Plaintiff

Exhibit B

Answer to Complaint with
Counterclaims

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

ROBIE GASTON,	:	CASE NO. 3:18-cv-02652 - JJH
Plaintiff,	:	
v.	:	
FINANCE SYSTEM OF TOLEDO, INC.,	:	
Defendant.	:	

**ANSWER TO COMPLAINT;
WITH COUNTERCLAIM**

Now comes Defendant, by counsel, and provides the following for its Answer and Counterclaim.

COMPLAINT 1. Plaintiff brings this action for damages pursuant to the Fair Debt Collection Practices Act ("FDCPA") under 15 U.S.C. §1692 et seq., for Defendant's unlawful conduct.

ANSWER 1. Denied

COMPLAINT 2. This action arises under and is brought pursuant to the FDCPA. Subject matter jurisdiction is conferred upon this Court by 28 U.S.C. §§1331 and 1337 as the action arises under the laws of the United States.

ANSWER 2. Denied

COMPLAINT 3. Venue is proper in this Court pursuant to 28 U.S.C. §1391 as Defendant conducts business in the Northern District of Ohio and a substantial portion the events or omissions giving rise to the claims occurred within the Northern District of Ohio.

ANSWER 3. Admitted

COMPLAINT 4. Plaintiff is a 54 year-old natural person residing in Toledo, Ohio which falls within the Northern District of Ohio.

ANSWER 4. Defendant is without sufficient knowledge to enable it to admit or deny this allegation and therefore denies it.

COMPLAINT 5. Defendant promotes that it "is one of the largest and most experienced full-service collection agencies in Northwest Ohio." Defendant is a corporation formed under the laws of the State of Ohio with James Nowak as its registered agent, located at 4808 North Summit, Toledo, Ohio 43611. Defendant uses the mail and telephone for the

principal purpose of collecting debts from consumers on a nationwide basis, including consumers in the State of Ohio.

ANSWER 5. Admitted

COMPLAINT 6. Defendant acted through its agents, employees, officers, members, directors, heirs, successors, assigns, principals, trustees, sureties, subrogees, representatives and insurers at all times relevant to the instant action.

ANSWER 6. Defendant is without sufficient knowledge to enable it to admit or deny this allegation and therefore denies it.

COMPLAINT 7. Upon information and belief, Plaintiff received medical services at The Toledo Clinic ("Toledo Clinic") on several occasions.

ANSWER 7. Defendant is without sufficient knowledge to enable it to admit or deny this allegation and therefore denies it.

COMPLAINT 8. Due to financial hardship, Plaintiff fell behind on his payments to Toledo Clinic, thus incurring debt ("subject consumer debts").

ANSWER 8. Defendant is without sufficient knowledge to enable it to admit or deny this allegation and therefore denies it.

COMPLAINT 9. Plaintiff incurred the subject consumer debts for personal services related to his healthcare.

ANSWER 9. Defendant is without sufficient knowledge to enable it to admit or deny this allegation and therefore denies it.

COMPLAINT 10. Between the spring of 2017 and the spring of 2018, Toledo Clinic charged-off the subject consumer debts and sold the collection rights to Defendant.

ANSWER 10. Denied

COMPLAINT 11. The Toledo Clinic stopped sending statements to Plaintiff when it charged-off the subject consumer debts.

ANSWER 11. Defendant is without sufficient knowledge to enable it to admit or deny this allegation and therefore denies it.

COMPLAINT 12. Upon information and belief, the balances of the subject consumer debts are \$775.30 and \$435.00.

ANSWER 12. Defendant is without sufficient knowledge to enable it to admit or deny this allegation and therefore denies it.

COMPLAINT 13. Defendant purchased the subject consumer debts while Plaintiff was in default.

ANSWER 13. Denied

COMPLAINT 14. Defendant has sought collection of the subject consumer debts from Plaintiff through collection correspondences.

ANSWER 14. Defendant admits that it sent correspondence to Plaintiff in an attempt to collect on an account. Defendant is without sufficient knowledge to enable it to admit or deny the remainder of the allegations in paragraph 14 and therefore denies them.

COMPLAINT 15. Defendant's collection efforts included sending correspondences dated January 15, 2018 and April 5, 2018. In those correspondences Defendant failed to disclose itself as a debt collector as shown in the language which appeared as follows:

ANSWER 15. Defendant admits that it sent correspondence to Plaintiff in an attempt to collect on an account. All other allegations in paragraph 15 are denied.

COMPLAINT 16. In its January 15, 2018 correspondence, Defendant included language which appeared as follows:

ANSWER 16. Defendant admits that the letter speaks for itself and denies all other allegations in paragraph 16.

COMPLAINT 17. Plaintiff received both correspondences from Defendant and was misled as to his rights and obligations.

ANSWER 17. Denied.

COMPLAINT 18. In Defendant's correspondence, Defendant included line items for interest and other costs.

ANSWER 18. Defendant admits that the letter speaks for itself and denies all other allegations in paragraph 18.

COMPLAINT 19. Accordingly, Plaintiff was falsely led to believe that Defendant had the lawful ability to collect interest and other costs.

ANSWER 19. Denied

COMPLAINT 20. Plaintiff spoke with Sulaiman regarding the correspondences resulting in pecuniary loss and expenditure of resources.

ANSWER 20. Denied

COMPLAINT 21. Plaintiff has suffered concrete harm as a result of Defendant's actions, including but not limited to, invasion of privacy, confusion, and aggravation.

ANSWER 21. Denied

COMPLAINT 22. Plaintiff repeats and realleges paragraphs 1 through 21 as though fully set forth herein.

ANSWER 22. Defendant incorporates its prior responses as though fully set forth herein.

COMPLAINT 23. Plaintiff is a "consumer" as defined by 15 U.S.C. §1692a(3) of the FDCPA.

ANSWER 23. Defendant is without sufficient knowledge to enable it to admit or deny the allegations in paragraph 23 and therefore denies them.

COMPLAINT 24. Defendant is a “debt collector” as defined by §1692a(6) of the FDCPA, because it regularly uses the mail and/or the telephone to collect, or attempt to collect, delinquent consumer accounts.

ANSWER 24. Admitted

COMPLAINT 25. Defendant identifies itself as a debt collector on its website, and is engaged in the business of collecting or attempting to collect, directly or indirectly, defaulted debts owed or due or asserted to be owed or due to others. Defendant has been a member of the Association of Credit and Collection Professionals, an association of debt collectors, since 1954.

ANSWER 25. Admitted

COMPLAINT 26. The subject consumer debts are “debt[s]” as defined by FDCPA §1692a(5) as they arise out of a transaction due or asserted to be due to another for personal, family, or household purposes.

ANSWER 26. Defendant is without sufficient knowledge to enable it to admit or deny the allegations in paragraph 26 and therefore denies them.

COMPLAINT 27. The FDCPA, pursuant to 15 U.S.C. §1692e, prohibits a debt collector from using “any false, deceptive, or misleading representation or means in connection with the collection of any debt.”

ANSWER 27. Defendant is without sufficient knowledge to enable it to admit or deny the allegations in paragraph 27 and therefore denies them.

COMPLAINT 28. In addition, this section enumerates specific violations, such as: “The false representation of – the character, amount, or legal status of any debt . . .” 15 U.S.C. § 1692e(2).

“The threat to take any action that cannot legally be taken or that is not intended to be taken.” 15 U.S.C. § 1692e(5).

“The use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer.” 15 U.S.C. §1692e(10); and

“The failure to disclose in the initial written communication with the consumer and, in addition, if the initial communication with the consumer is oral, in that initial oral communication, that the debt collector is attempting to collect a debt and that any information obtained will be used for that purpose, and the failure to disclose in subsequent communications that the communication is from a debt collector, except that this paragraph shall not apply to a formal pleading made in connection with a legal action.” 15 U.S.C. §1692e(11).

ANSWER 28. Defendant is without sufficient knowledge to enable it to admit or deny the allegations in paragraph 28 and therefore denies them.

COMPLAINT 29. Defendant violated 15 U.S.C. §§ 1692e, e(2), e(5), and e(10) through the inclusion of language mentioning interest and costs. The inclusion of this language misleadingly suggests to consumers the false possibility that Defendant could collect an amount that would be above and beyond that which was outlined as the total due on the

collection correspondence. The subject consumer debts were charged-off by Toledo Clinic in the amount of \$775.30. Upon charge-off, Toledo Clinic and its successors waived the right and ability to add interest and other charges, as evidenced by Defendant seeking to collect the same amount of \$775.30 and the fact that Toledo Clinic stopped sending periodic billing statements for the subject consumer debts. It was a legal impossibility for Defendant to add interest and other charges to the subject consumer debts at the time the correspondence were sent. Defendant purposefully included this misleading language to instill a false sense of urgency in Plaintiff so that he would feel compelled to make payment.

ANSWER 29. Denied.

COMPLAINT 30. Defendant violated 15 U.S.C. §§ 1692e, e(10), and e(11) through its failure to disclose itself as a debt collector. By failing to disclose itself as a debt collector, Defendant deceptively and misleadingly attempted to obscure Plaintiff's rights under the FDCPA. Consequently, Defendant's objective was to obfuscate its status as a debt collector in order to prevent Plaintiff from believing that he was afforded certain FDCPA protections against Defendant.

ANSWER 30. Denied.

COMPLAINT 31. The FDCPA, pursuant to 15 U.S.C. §1692f, prohibits a debt collector from using "unfair or unconscionable means to collect or attempt to collect any debt."

ANSWER 31. Defendant is without sufficient knowledge to enable it to admit or deny the allegations in paragraph 31 and therefore denies them.

COMPLAINT 32. In addition, this section enumerates specific violations, such as: "The collection of any amount (including any interest, fee, charge, or expense incidental to the principal obligation) unless such amount is expressly authorized by the agreement creating the debt or permitted by law ." 15 U.S.C. §1692f(1).

ANSWER 32. Defendant is without sufficient knowledge to enable it to admit or deny the allegations in paragraph 32 and therefore denies them.

COMPLAINT 33. Defendant violated §1692f and f(1) when it unfairly suggested that it could collect additional amounts above and beyond the total balance due as represented in the correspondence. Because Defendant was precluded from adding anything to the balances of the subject consumer debts as its right to do so was waived, the above referenced portions of correspondence violate the FDCPA.

ANSWER 33. Denied.

COMPLAINT 34. Defendant further violated §1692f when it unfairly and unconscionably attempted to collect on a debt by concealing its status as a debt collector. Failing to disclose itself as a debt collector is an unfair and unconscionable act intended to confuse Plaintiff regarding the status and identity of the debt collector and unlawfully designed shield itself from any potential retaliation.

ANSWER 34. Denied.

COMPLAINT 35. As pled in paragraphs 19 through 21, Plaintiff has been harmed and suffered damages as a result of Defendant's unlawful actions.

ANSWER 35. Denied.

All other allegations in the Complaint are denied.

ADDITIONAL DEFENSES

1. Plaintiff's claims are barred by the applicable statute of limitations.
2. Plaintiff's injuries or damages, if any, are the result of her own acts or omissions.
3. Pursuant to 15 USC § 1692k, any violations that may be found were not intentional and resulted from a bona fide error notwithstanding the maintenance of procedures reasonably adapted to avoid such error.
4. Plaintiff lacks standing, as Plaintiff did not suffer an injury or loss sufficient to have standing.
5. Defendant relied upon and acted in good faith conformity with a prior opinion from the Federal Trade Commission. 15 U.S.C. 1692k(e).

COUNTERCLAIM

As set forth in the Fair Debt Collection Practices Act, 15 U.S.C. § 1692k, Defendant is entitled to attorney fees and its cost of defending this matter.

Respectfully Submitted,

/s/James S. Nowak
James S. Nowak (0012890)
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Toledo, Ohio 43611
Phone: (419) 726-2605
Fax: (419) 726-1549
Attorney for Finance System of Toledo, Inc.

/s/Boyd W. Gentry
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bgentry@boydgentrylaw.com

zelliott@boydgentrylaw.com

Attorneys for Finance System of Toledo, Inc.

CERTIFICATE OF SERVICE

I certify that the foregoing was filed with the Clerk of Court's CM/ECF system which will provide electronic service to all counsel on January 24, 2019.

/s/Boyd W. Gentry

Boyd W. Gentry (0071057)

Exhibit C

Def. FST Responses to Pla.
First Set of Combined
Discovery Requests

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

Robie Gaston,	:	Case No: 3:18-cv-02652-JJH
	:	
Plaintiff,	:	
	:	Judge: Helmick
v.	:	
	:	
Finance System of Toledo, Inc.,	:	Defendant Finance System of Toledo,
	:	Inc.'s Responses to Plaintiff's First Set of
Defendant.	:	Combined Discovery Requests
	:	

Now comes Defendant Finance Systems of Toledo, Inc. ("FST") and provides the following for its responses to Plaintiff Robie Gaston's ("Gaston") first set of combined discovery requests directed to it.

General Objections

1. FST's general objections to Gaston's discovery requests are made without waiver of or prejudice to specific objections that are made.
2. FST objects to each discovery request to the extent that the information or documentation requested is protected from discovery by the attorney-client privilege, work-product doctrine or other applicable privileges or immunities.
3. FST objects to each and every discovery request to the extent that the information requested is irrelevant, duplicative, unreasonably vague, overbroad, repetitious, unduly burdensome, equally accessible to each party, not important in resolving the issues of the case, or purports to require the disclosure of information beyond the scope of permissible discovery under the Federal Rules of Civil Procedure.

REQUESTS FOR ADMISSION

1. Admit that You are in the business of using the mail system to collect consumer debts originally owed to others.

ANSWER:

Admitted, but Defendant does not know if any particular account is a "debt" under 15 U.S.C. 1692a.

2. Admit that You are a business whose principal purpose is the collection of debts.

ANSWER:

Admitted, but Defendant does not know if any particular account is a “debt” under 15 U.S.C. 1692a.

3. Admit that You are a debt collector as defined by the Fair Debt Collection Practices Act (“FDCPA”).

ANSWER:

Admitted, but Defendant does not know if any particular account is a “debt” under 15 U.S.C. 1692a.

4. Admit that You sent the collection letters as discussed in Plaintiff’s complaint.

ANSWER:

Denied. Defendant does not know what letters to which this request refers as the complaint alleges certain letters that were not sent by Defendant.

5. Admit that the collection letters You sent to Plaintiff are form letters.

ANSWER:

Admitted.

6. Admit that you were not the creditor or holder of the debt with regard to the collection letters You sent to Plaintiff.

ANSWER:

Admitted.

7. Admit that Your collection department utilizes technology or software that generates or creates the collection letters You sent to Plaintiff.

ANSWER:

Admitted that Defendant uses technology or software to generate or request letters, but Defendant does not know what letters to which this request refers as the complaint alleges certain letters that were not sent by Defendant.

8. Admit that Your collection department utilizes technology or software that generates or creates portions of the collection letters You sent to Plaintiff.

ANSWER:

Admitted that Defendant uses technology or software to generate or request letters, but Defendant does not know what letters to which this request refers as the complaint alleges certain letters that were not sent by Defendant.

9. Admit that You contract with or otherwise utilize a third party to create or generate all or portions of the collection letters You sent to Plaintiff.

ANSWER:

Admitted that Defendant utilizes a third party, on occasion, to generate or request letters, but Defendant does not know what letters to which this request refers as the complaint alleges certain letters that were not sent by Defendant.

INTERROGATORIES

Defendant is required to provide a written response to the following interrogatories:

1. State the name, address and title of each and every party or individual providing any information or documents with respect to the answers to these Interrogatories, Requests to Produce, and Requests to Admit.

RESPONSE:

**Nancy Quiroga, Client Services Manager
Amy Pfeiffer, Collection Manager
Finance System of Toledo, Inc.
PO Box 351297
Toledo, Ohio 43537-1297**

Ms. Quiroga and Ms. Pfeiffer are represented by the undersigned and may be contacted through the undersigned counsel.

2. Please identify by name, case number, and jurisdiction, any and all cases where Defendant has been found to have violated and/or has been alleged to have violated the Fair Debt Collection Practices Act ("FDCPA"), or where Defendant settled an FDCPA violation or alleged violation by way of payment of any United States currency. This question relates to any such actions taken within five (5) years of the date of the filing of the underlying lawsuit.

RESPONSE:

Objection. This request calls for information that has no relevance to the claims and defenses in this case. The Federal Rules of Civil Procedure require that discovery requests to be relevant. Beyond this though, this discovery request is overly broad and unduly burdensome, it has no importance in resolving the claims in this case, the burden and expense far outweigh the benefits because there would be no benefits to providing this information in discovery.

3. State the name, address, title, and job description of each of Your employee(s) who had oversight of or otherwise controlled the creation of the collection letters sent by You to Plaintiff.

RESPONSE:

**Amy Pfeiffer, Collection Manager
Nancy Quiroga, Client Services Manager
Finance System of Toledo, Inc.**

**PO Box 351297
Toledo, Ohio 43537-1297**

4. State the name, address, title, and job description of each individual who authorizes or approves the content, nature, and/or structure of the collection letters sent to Plaintiff.

RESPONSE:

**Amy Pfeiffer, Collection Manager
Nancy Quiroga, Client Services Manager
Finance System of Toledo, Inc.
P.O. Box 351297
Toledo, Ohio 43537-1297**

5. Please provide a detailed description of the services that You perform for the original creditor(s) of the debt(s) You were collecting on when communicating with Plaintiff.

RESPONSE:

Objection. “Detailed” is vague and ambiguous. Defendant performs account management services for the creditors at issue, including attempted communications with Plaintiff via telephone and letters. Defendant also received and processed numerous payments from Plaintiff.

6. Please state the number of collection letters You have sent to any accounts that You service, or upon which you were collecting a debt, during the relevant time period, and indicate the number of collection letters sent per month, and indicate the method of delivery, whether by U.S. mail or otherwise.

RESPONSE:

Objection. This request calls for information that has no relevance to the claims and defenses in this case and thus, is beyond the scope of discovery. Additionally, this request is overly broad and unduly burdensome.

7. Please state in detail the transactions and/or any and all agreements relating to Your acquisition of the rights to collect upon the subject debt, and specify all documents and the date of such documents relating to such transactions.

RESPONSE:

Objection. This request does not relate to any claim or defense. Without waiving objections, Defendant has an agreement with each creditor to service that creditor's accounts.

8. Please list any and all agreements, assignments, and/or insurance policies that You have in place either to indemnify/insure or be indemnified/insured for Your activities relating to Plaintiff, including but not limited to all agreements by and between You and the original creditor(s) relating to the instant matter.

RESPONSE:

None.

9. Identify all written correspondences, including emails, You have sent to and/or received from the Plaintiff during the relevant time period. For each written correspondence, please list the date and the content of the written correspondence.

RESPONSE:

Defendant received a money order from Plaintiff for a payment. Defendant has no record of receiving other written correspondence from Plaintiff. Defendant does not have copies of the actual written correspondence it sent to Plaintiff: Plaintiff has the originals. Defendant has requested to inspect those originals and will update and reconsider its response upon such inspection.

10. State the name, title or position, address and phone number of each and every witness that Defendant plans to call to testify at trial in this case and state the substance of the testimony expected from each witness.

RESPONSE:

Corporate representative from Renkim to testify about the correspondence that was sent to Plaintiff.

Derek Blue, account representative at Renkim Corporation, 13333 Allen Road, Southgate, Michigan 48195.

11. Identify all emails, collection records, data records, statements, phone recordings, oral communications, or any other form of data related to the collection efforts Defendant engaged in regarding Plaintiff during the relevant time period.

RESPONSE:

Defendant has a number of emails with its counsel in this case which were created after this litigation commenced. Those emails are confidential communications between Defendant and its attorneys and are withheld on that basis. Defendant also has an email to Cristen Balk at Allstar Disposal requesting details of Plaintiff's account. That email was sent at the request of Defendant's counsel, and thus, is subject to work product protections. It is being withheld on that basis

Without waiving objection, see account notes produced with Defendant's Rule 34 responses.

12. Identify any and all third parties that were responsible for creating, or otherwise had input over the content, form or nature of the collection letters you sent to Plaintiff during the relevant time period.

RESPONSE:

Renkim Corporation

**Nancy Quiroga, Client Services Manager
Amy Pfeiffer, Collection Manager
Finance System of Toledo, Inc.
PO Box 351297
Toledo, Ohio 43537-1297**

14. Identify any system, computer software, application, or other form of technology used by You or any third parties to generate the collection letters You sent to Plaintiff.

RESPONSE:

Collect One, from CDS Software.

15. Explain the basis for any claim that any violation alleged in the complaint was unintentional and resulted from a bona fide error notwithstanding the maintenance of procedures reasonably adapted to avoid such error. Identify what procedures are maintained and how they are adapted to avoid the matters complained of.

RESPONSE:

Defendant is not claiming to have made an error.

16. State all actions taken by You to verify the accuracy and completeness of any records provided to You by the original creditor(s) of the subject debt(s) upon which You were collecting or attempting to collect when communicating with Plaintiff.

RESPONSE:

Objection. Plaintiff has not disputed the records of the original creditors. This request is not related to any claim or defense but is beyond the scope of discovery.

17. Describe all collection activities, which You were authorized to perform by the original creditor(s), and identify the terms of the agreement between the original creditor(s) and You pursuant to which You sought to collect the subject debt(s).

RESPONSE:

Objection. This request is not related to any claim or defense but is beyond the scope of discovery.

18. For each person who has had any involvement in any manner in any efforts on Your behalf to collect or attempt to collect any debt(s) purported owed by Plaintiff, state his/her name, position, work address, and telephone numbers, and the nature and purpose of his/her involvement.

RESPONSE:

Objection. This request is overly broad and unduly burdensome. The only claim in this case is limited to the application of the FDCPA to the words on the January 15, 2018 letter.

Without waiving objection, the following persons are employees of Defendant who had involvement with Plaintiff's accounts.

**Heather Pottker, Collector ("HTP"), Collector
Sierra Dupuis ("SRD"), Collector
Nancy Quiroga ("NJQ"), Client Service Manager
Beverly Eastman ("BAE"), Payment Poster
Dana Miller ("DMM"), Collector
Amy Pfeiffer ("AEW"), Collection Manager
Emily Parker ("EKP"), Collector
Susan Poiry ("SJP"), Clerical
Louise Stricker ("LAS"), Clerical
Anita Mendoza ("ANM"), Clerical
Mary Humpert ("MEH"), Clerical
Katie Stayancho ("KPS"), Collector**

**Shelly Duncan (“SBD”), Collector
Mary Squire (“MJS”) Collector
Kathy Miller (“KMM”) Clerical
Danelle Zemenski (“DAD”), Clerical
Shana Shannon (“SBS”), Collector
Cathy Lipkowski (“CEL”), Collector**

19. To the extent not previously done, identify all documents relevant, related to, or reflecting any aspect of any efforts undertaken by You to collect any debt(s) from Plaintiff, or to any debt(s) purportedly owed by Plaintiff to You or any original creditor(s).

RESPONSE:

See Account notes marked FST1-42.

20. Identify how the information regarding Plaintiff, including but not limited to Plaintiff’s personal information and the information regarding purported debts or accounts, was inputted into the collection letters sent to Plaintiff.

RESPONSE:

Plaintiff’s identification information was pulled from information contained in the Collect One software system.

21. Identify in which situations You add language mentioning interest and/or costs in Your collection letters to consumers.

RESPONSE:

Letters sent to consumers who have multiple accounts might include the terms “interest”. The term “costs” is not normally used in letters, and Defendant cannot locate a letter sent to Plaintiff which included the term “costs”. Also, letters sent to consumers who have been sued by the creditor might include the terms “interest”. The term “costs” is not normally used in such letters.

22. Identify all of the language you include regarding interest and/or costs Your collection letters.

RESPONSE:

Every letter is unique in its exact content and wording. Plaintiff has the letters sent to him. See January 15, 2018 letter disclosed by Plaintiff in discovery and quoted in the complaint.

VERIFICATION OF INTERROGATORY RESPONSES

I verify that the foregoing responses to Interrogatories are true and correct to the best of my knowledge and the information available to me.

Signed in my presence:

NOTARY PUBLIC

My Commission Expires_____

REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS

Defendant is required to produce for inspection and copying all of the following categories of documents to Plaintiff's counsel:

1. Any and all documents (including electronically stored information ("ESI") and tangible things relating to the claims or defenses in this action.

RESPONSE:

Please see documents attached hereto, which have been bates-stamped as FST1-42.

2. Any and all documents (including ESI) and tangible things required to be disclosed pursuant to Federal Rule of Civil Procedure 26(a)(1)(A).

RESPONSE:

Please see documents attached hereto, which have been bates-stamped as FST1-42.

3. Any and all records concerning Plaintiff.

RESPONSE:

Objection. This request calls for information generally "concerning Plaintiff" without any indication that it is seeking relevant information. FST objects to the extent that FST has information "concerning Plaintiff" that is irrelevant to the claims and defenses in this case. Without waiving these objections, please see documents attached hereto, which have been bates-stamped as FST1-42.

4. All of Your account notes regarding Plaintiff.

RESPONSE:

Objection. This request calls for information generally "regarding Plaintiff" without any indication that it is seeking relevant information. FST objects to the extent that FST has information "concerning Plaintiff" that is irrelevant to the claims and defenses in this case. Without waiving these objections, please see documents attached hereto, which have been bates-stamped as FST 10-17 (payment records) and 18-42 (internal account notes).

5. Any written correspondence(s) mailed, including email, to Plaintiff during the relevant time period.

RESPONSE:

Objection. Plaintiff is in possession of the original correspondence in this case. Defendant does not have copies of the actual written correspondence it sent to Plaintiff. Defendant has requested to inspect those originals and will update and reconsider its response upon such inspection.

6. Please provide all emails, voicemails, collection records, data records, statements, telephone recordings, or any other form of data related to Plaintiff.

RESPONSE:

Objection. This request calls for information generally “related to Plaintiff” without any indication that it is seeking relevant information. FST objects to the extent that FST has information “concerning Plaintiff” that is irrelevant to the claims and defenses in this case. An audio recording between Plaintiff and Defendant exists, but it is irrelevant to the remaining claim alleged in the complaint. Without waiving these objections, please see documents attached hereto, which have been bates-stamped as FST1-42.

7. All documents regarding how You determine the layout of Your collection letters.

RESPONSE:

Objection. This request calls for information that is overly broad and unduly burdensome. Additionally, it potentially requests information that is subject to attorney-client privilege or includes attorney work product. Finally, this request calls for information that is beyond the scope of discovery, as some of the requested documents may relate to correspondence that was never sent to Plaintiff in this case and thus, the documents requested would be irrelevant to the claims and defenses in this case.

8. All manuals, memoranda, instructions, and other documents that discuss, describe, or set forth standards, criteria, guidelines, policies, or practices relating to compliance with the Fair Debt Collection Practices Act (“FDCPA”).

RESPONSE:

Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case.

9. Any and all documented data retention policies and a description of the data retention policies actually in place.

RESPONSE:

Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case.

10. Copies of each and every exhibit, known at this time, that You will seek to introduce into evidence at trial.

RESPONSE:

Objection. This request is premature. FST will provide this information in accordance with any Court Orders and the Federal Rules of Civil Procedures.

11. Copies of the operation manual(s) for all systems and/or technology employed by You or any third parties to create the collection letters You sent to Plaintiff during the relevant time period.

RESPONSE:

Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case.

12. All court orders in which you have been found to have violated the Fair Debt Collection Practices Act ("FDCPA").

RESPONSE:

Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case. Additionally, this request is overly broad and unduly burdensome and is for the purpose of harassing FST.

13. The complete file, including but not limited to computer information, for all of the collection efforts engaged in towards Plaintiff.

RESPONSE:

Objection. This request calls for information generally regarding "Plaintiff" without any indication that it is seeking relevant information. FST objects to

the extent that FST has information about “Plaintiff” that is irrelevant to the claims and defenses in this case. Additionally, the Federal Rules of Civil Procedure require that requests for production of documents “describe with reasonable particularity each line or category to be inspected” and the general statement for the “complete file” does not meet this standard.

Without waiving these objections, please see documents attached hereto, which have been bates-stamped as FST1-42.

14. Please provide all documents relating to the technology employed by Your collections department to send the collection letters to Plaintiff.

RESPONSE:

Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case.

15. Please provide Your internal procedures or manual(s) relating to Your debt collection activities.

RESPONSE:

Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case.

16. Please provide all documents relating to the technology employed by Your collections department to create the collection letters You sent to Plaintiff.

RESPONSE:

Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case.

17. Any and all documents pertaining to Your policies and procedures as to past due accounts, including any attempts to collect debts, collection of monies and/or debts and/or past due accounts.

RESPONSE:

Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case.

18. Any and all communications by and between You and the original creditor(s) relating to Plaintiff's account(s), including but not limited to any original creditor(s) agreement to hire or otherwise turn the subject debt(s) over to You for collection, and any communications regarding that agreement and communications concerning Plaintiff.

RESPONSE:

Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case.

19. Any and all agreements, assignments, and/or insurance policies that You have in place either to indemnify/insure or be indemnified/insured for Your activities relating to Plaintiff, including but not limited to all agreements between You and the original creditor(s) relating to the instant matter.

RESPONSE:

Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case.

20. Any and all documents or statements outlining or explaining the creation of the \$197.00 in "fees" as referenced in the collection letter sent regarding account number [REDACTED] 850.

RESPONSE:

Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case. The "\$197" "fee" is not in the one letter at issue in this case.

21. All documents explaining or outlining the calculation of interest charges on the debts upon which you were attempting to collect when sending Plaintiff the collection letters referenced in his Complaint.

RESPONSE:

Defendant did not calculate interest on the one letter at issue in this case.

22. Any and all documents which explain any codes, symbols, keys, phrases, and/or shorthand notations which are contained within Your records and/or account notes.

RESPONSE:

Objection. This request requires FST to create documents. The Federal Rules of Civil Procedure do not contemplate the creation of documents in response to a discovery request and this is improper.

23. Please provide any and all documents outlining or addressing Your policies and procedures as they relate to the addition of interest and fees to the principal balance of debts which have been turned over to You for collection.

RESPONSE:

Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case. Defendant did not calculate interest on the one letter at issue in this case.

Respectfully submitted,

/s/Boyd W. Gentry

Boyd W. Gentry (0071057)

Zachary P. Elliott (0090057)

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Toledo, Ohio 43611

Phone: (419) 726-2605

Fax: (419) 726-1549

Attorney for Finance System of Toledo, Inc.

Certificate of Service

I certify that the foregoing has been served via e-mail and regular mail to all counsel of record, as indicated below, on September 20, 2019.

Nathan C. Volheim
Taxiarchis Hatzidimitriadis
Sulaiman Law Group, Ltd.
2500 South Highland Ave., Suite 200
Lombard, Illinois 60148
nvolheim@sulaimanlaw.com
thatz@sulainmanlaw.com

/s/Boyd W. Gentry
Boyd W. Gentry (0071057)

Exhibit F

Def. FST Produced Account
Notes for Clt. Epno Toledo
Hospital ER Physician

ALEDFWKC 12/03/18 14:02:21 Print Debtor Work Card PAGE 1
 Clt EPNO INC TOLEDO HOSP ER PHYS Ac# FSTI 018581 9546
 Rf# 3400

Nm1 GASTON,ROBIE	Desk 014 Sts PIF Assignd	66.37
Nm2	Assigned 07/23/13 PrincDue	.00
Adr 6543 SOUTH AVE	L/Charge 12/25/12 In .00 %	.00
	L/Paymnt Attorney	.00
HOLLAND, OH 43528-0000	L/Letter 09/30/13 Court	.00
PhN 419-891-8381	L/Worked 11/26/18 Other	.00
	L/Trust 10/24/17 JudInt	.00
	N/Review Misc	.00
Msg	CntgcyFe	.00
	Tot Due	.00
	Tot Paid	66.37

HISTORY

Date	Time	Uid	Description	CR	Dsk	NxtRv	Txt	NextLtr	Sts
07/23/13	16:01		New Assignment	Y	014	08/22		1 07/23	HSE
07/23/13	21:02	CDS	Ltr to 01 FIRST LETTER	Y	014	08/22	001 2	08/23	HSE
08/23/13	21:03	CDS	Ltr to 01 JUNK LETTER	Y	014	08/23	JNK 3	08/23	HSE
08/23/13	21:03	CDS	Ltr/Ser Completed	Y	014	08/23			HSE
08/23/13	21:03	CDS	Sts Chg:HSE To NEW	Y	014	08/23			NEW
08/23/13	21:03	CDS	NEW BUSINESS	Y	014	08/24			NEW
09/20/13	12:18	HTP	Sts Chg:NEW To DLS	Y	014	08/24			DLS
09/20/13	12:18	HTP	CALED PHN 1 - NO ANSWER	Y	014	10/04			DLS
09/20/13	12:18	HTP	DEMAND LETTER SENT	Y	014	10/04			DLS
09/20/13	12:18	HTP	Ltr to 01 DEMAND LETTER	SNT Y	014	10/04	002		DLS
09/26/13	14:02	LAS	Sts Chg:DLS To PYR	Y	014	10/04			PYR
09/26/13	14:02	LAS	PAYMENT RECEIVED	Y	014	09/27			PYR
09/30/13	10:21	HTP	Sts Chg:PYR To SBL	Y	014	09/27			SBL
09/30/13	10:21	HTP	SMALL BALANCE LTR	Y	014	10/14			SBL
09/30/13	10:21	HTP	Ltr to 01 SMALL BALANCE LETT	SNT Y	014	10/14	005		SBL
03/09/15	14:28	BAE	Sts Chg:SBL To PYR	Y	014	10/14			PYR
03/09/15	14:28	BAE	PAYMENT RECEIVED	Y	014	03/10			PYR
03/10/15	12:43	HTP	Sts Chg:PYR To CTC	Y	014	03/10			CTC
03/10/15	12:43	HTP	Dsk Chg:014 To 015	Y	015	03/10			CTC
03/10/15	12:43	HTP	COLLECTOR TO COLLECTOR	Y	015	03/11			CTC
SPS TO RACHEL?									
03/11/15	16:40	EKP	Account Tied	Y	015	03/11			CTC
03/13/15	11:24	EKP	Sts Chg:CTC To PTP	Y	015				PTP
03/13/15	11:24	EKP	Tie Change	Y	015				PTP
09/22/15	08:32	EKP	Sts Chg:PTP To BRK	Y	015				BRK
09/22/15	08:32	EKP	Tie Change	Y	015				BRK
09/23/15	16:58	EKP	Sts Chg:BRK To LTR	Y	015				LTR
09/23/15	16:58	EKP	Tie Change	Y	015				LTR
10/08/15	08:41	EKP	Sts Chg:LTR To PTP	Y	015				PTP
10/08/15	08:41	EKP	Tie Change	Y	015				PTP
06/08/16	11:54	EKP	Sts Chg:PTP To PAT	Y	015				PAT
06/08/16	11:54	EKP	Tie Change	Y	015				PAT
12/28/16	13:34	EKP	Sts Chg:PAT To LGR	Y	015				LGR
12/28/16	13:34	EKP	Tie Change	Y	015				LGR
12/28/16	13:36	EKP	Sts Chg:LGR To PAT	Y	015				PAT
12/28/16	13:36	EKP	Tie Change	Y	015				PAT
01/26/17	13:55	EKP	Sts Chg:PAT To LGR	Y	015				LGR

ALEDFWKC 12/03/18 14:02:21 Print Debtor Work Card PAGE 2
 01/26/17 13:55 EKP Dsk Chg:015 To LG1 Y LG1 LGR
 01/26/17 13:55 EKP Tie Change Y LG1 LGR
 06/13/17 13:36 HTP Account Untied Y LG1 LGR
 UNTIED FROM HEADER: [REDACTED] 732 GASTON, RACHEL
 08/31/11 13:59 MJS CALLED PHN 1-LEFT MSGE ON A/M Y 017 09/14 DLS
 08/31/11 13:59 MJS DEMAND LETTER SENT Y 017 09/14 DLS
 08/31/11 13:59 MJS Ltr to 01 DEMAND LETTER TIED SNT Y 017 09/14 T02 DLS
 09/14/11 12:25 MJS CALLED PHN 1-LEFT MSGE ON A/M Y 017 10/14 LLS
 09/14/11 12:25 MJS LAST LTR SENT TO DTR Y 017 10/14 LLS
 09/14/11 12:25 MJS Ltr to 01 LAST LETTER TIED SNT Y 017 10/14 T04 LLS
 12/01/11 13:33 MJS ADDITIONAL REMARK Y 017 12/01 LLS
 ***LOOKS LIKE THIS D WORKS FOR THE SHERIFFS OFFICE. PER COUNTY EMPLOYEE
 SIGHT.
 12/01/11 13:34 MJS ADDITIONAL REMARK Y 017 12/01 LLS
 CORRECTION CENTER.
 12/01/11 13:37 MJS ADDITIONAL REMARK Y 017 12/01 LLS
 CALLED POE AND WAS TRANSFERED TO D. THEY STATED THAT SHE COMES IN AFTER
 4
 12/01/11 13:37 MJS ACT/PENDING REVIEW Y 017 12/01 RVW
 12/02/11 08:25 MJS ADDITIONAL REMARK Y 017 12/02 RVW
 12/02/11 16:08 MJS ACT/PENDING REVIEW Y 017 12/02 RVW
 CALLED POE AND NO ANSW.
 03/28/12 19:46 SBD CALLED PHN 1-LEFT MSGE ON A/M Y 006 04/27 LGR
 ADDED PHONE FROM TRAILER HAS LEGAL THAT IS NOT YET PAYING
 03/28/12 19:46 SBD CALLED PHN2 - LFT MSGE ON A/M Y 006 04/27 LGR
 03/28/12 19:46 SBD LEGAL REVIEW Y 006 04/27 LGR
 03/28/12 19:46 SBD GOOGLED DEBTOR Y 006 04/27 LGR
 05/30/12 13:48 SBD LEGAL REVIEW Y 006 06/29 LGR
 05/30/12 13:49 SBD ADDITIONAL REMARK Y 006 06/29 LGR
 NO NEW INFO
 07/20/12 10:00 SBD ACT/PENDING REVIEW Y 006 07/20 RVW
 NOTHING ON LEGAL
 02/11/13 16:50 KPS CALLED PHN 1 - NO ANSWER Y 010 02/11 RVW
 D ALREADY HAS LEGAL THAT HASN'T RECEIVED ANYTHING BNUT A \$10 PYMT SO
 FAR. THESE BILLS HAVE RCV'D FIRST AND LAST LETTERS.
 02/11/13 16:50 KPS TEL BUSY Y 010 02/11 RVW
 02/11/13 16:50 KPS ACT/PENDING REVIEW Y 010 02/11 RVW
 03/14/13 09:04 AEW LEGAL COLLECTOR REVIEW Y 010 03/15 LRV
 03/29/13 13:40 KPS LEGAL REVIEW Y 010 04/28 LGR
 NOT SENDING OUT ANY OTHER LTRS ON THIS UNTIL OTHER CURRENT LEGAL
 STARTS GETTING PAID OFF SOME MORE.
 06/14/13 09:24 KPS LEGAL REVIEW Y 010 07/14 LGR
 STILL NO MOVEMENT ON LEGAL CASE. JUST STICKING THIS BACK IN LGR
 06/14/13 15:29 AEW ADDITIONAL REMARK Y 010 07/14 LGR
 IF NO UPDATES ON H 5942517 BY AUGUST LET ME KNOW AND I WILL RE-CHK
 WITH ATTY ON STATUS
 08/19/13 13:54 DMM TEL MADE CONTACT Y 007 10/18 LGR
 CD PH#1. SHE STATED WENT TO DOC TODAY & HASN'T BEEN RELEASED TO RETRN
 TO EMP. SHE GOES BCK TO DOC IN 2-3WKS TO BE RE-ASSESSED. IS ON MED
 LEAVE. ADVSD I WILL CB 2MOS TO SEE IF SHE'S RETRND TO EMP & SEE ABT
 P/A
 08/19/13 13:54 DMM LEGAL REVIEW Y 007 10/18 LGR
 10/18/13 09:44 DMM LEGAL REVIEW Y 007 11/17 LGR

ALEDFWKC 12/03/18 14:02:21 Print Debtor Work Card PAGE 3
 STILL, X PYMNTS ON LEGAL
 02/04/14 11:51 EKP CALLED PHN 1-LEFT MSGE ON A/M Y 015 03/06 ALS
 SENDING NEW ALS FOR PAT
 02/04/14 11:51 EKP ATTY LTR SENT TO DTR Y 015 03/06 ALS
 02/04/14 11:52 EKP ATTY LTR SENT TO DTR Y 015 03/06 ALS
 02/04/14 11:52 EKP Ltr to 01 BIESIADA ATTY LETT SNT Y 015 03/06 027 ALS
 02/04/14 11:52 EKP POSSIBLE ASSET FOR LEGAL Y 015 02/18 PAT
 03/10/14 15:43 CEL COLLECTOR TO COLLECTOR Y 015 03/11 CTC
 ADDED THREE NEW TRailers-cel
 03/11/14 09:46 EKP POSSIBLE ASSET FOR LEGAL Y 015 03/25 PAT
 03/11/14 13:03 EKP PMT PLAN STARTED Y 015 03/25 PAY
 WANTS TO DO 40/EOM. WILL CALL IN ON THE 28TH TO DO OVER PH. CONFIRMED
 AD AND WILL AND EXPLAINED ARRANG LETTER GOING OUT WITH UPDATED
 BALANCE. ADVISED THAT ONCE SHE IS WORKING FT AGAIN SHE NEEDS TO UP
 THESE PAYMENTS SINCE IT WILL CURRENTLY TAKE HER A LONG TIME TO PAY
 OFF.
 THIS ACTION SENDS A T06 AUTOMATICALLY
 03/11/14 13:03 EKP Ltr to 01 PAYMENT PLAN LETTE SNT Y 015 03/25 T06 PAY
 03/11/14 13:03 EKP PAYMENT PLAN START UP Y 015 PAY
 03/11/14 14:33 LAS ADDITIONAL REMARK Y 015 PAY
 RECD CK#3005 FOR \$20.00-NOTHING IN IT WINDOW/OK TO APPLY PMT
 03/18/14 21:00 CDS Pymnt Plan Reminder Y 015 JNK PAY
 03/26/14 15:32 DMM HOLD VIRTUAL CHECK PAYMENTS N PAY 03/26 HVC
 DC TO MAKE \$40 CHCK PYMNT FOR MARCH.
 03/27/14 11:00 MEH PAYMENT RECEIVED N 015 03/28 PYR
 03/27/14 11:40 MEH ADDITIONAL REMARK N 015 03/28 PYR
 03/27/14 11:40 MEH Ltr to 01 TIE RECEIPT CHECK SNT N 015 03/28 RCP PYR
 04/07/14 09:36 EKP PAYMENT PLAN START UP N 015 PAY
 05/05/14 11:30 EKP ADDITIONAL REMARK N 015 07/30 PAY
 06/04/14 19:33 EKP PAYMENT PLAN START UP N 015 PAY
 06/04/14 19:33 EKP Promise PTP 40.00 On 072514 N 015 07/25 PTP
 07/02/14 14:36 LAS PAYMENT RECEIVED N 015 07/03 PYR
 07/07/14 08:41 EKP Promise PTP 40.00 On 072514 N 015 07/25 PTP
 07/30/14 21:00 CDS BROKEN PROMISE N 015 07/31 BRK
 #ST="PTP" #LW="151033" #RV="000000"
 08/04/14 12:17 LAS PAYMENT RECEIVED N 015 08/05 PYR
 08/06/14 19:11 EKP Promise PTP 40.00 On 091514 N 015 09/15 PTP
 09/09/14 14:45 LAS PAYMENT RECEIVED N 015 09/10 PYR
 09/11/14 13:02 EKP Promise PTP 40.00 On 100914 N 015 10/09 PTP
 09/30/14 11:32 LAS PAYMENT RECEIVED N 015 10/01 PYR
 10/06/14 09:15 EKP Promise PTP 40.00 On 113014 N 015 11/30 PTP
 10/31/14 13:39 LAS PAYMENT RECEIVED N 015 11/01 PYR
 11/03/14 09:26 EKP Promise PTP 40.00 On 122614 N 015 12/26 PTP
 12/02/14 15:50 LAS PAYMENT RECEIVED N 015 12/03 PYR
 12/04/14 08:47 EKP Promise PTP 40.00 On 013115 N 015 01/31 PTP
 01/07/15 12:08 ANM PAYMENT RECEIVED N 015 01/08 PYR
 01/08/15 16:07 EKP Promise PTP 40.00 On 022815 N 015 02/28 PTP
 02/04/15 10:40 ANM PAYMENT RECEIVED N 015 02/05 PYR
 02/05/15 09:01 EKP Promise PTP 40.00 On 042415 N 015 04/24 PTP
 03/11/15 19:49 EKP ADDITIONAL REMARK N 015 04/24 PTP
 ADDED TRL FOR SP SINCE HIS INFO IS ON THE BANKING PMT INFO WE
 RECIEVED. ALSO THE AD ON CHECK IS DIFF FROM HEADER THAT WAS VERIFIED
 PREV SO JUST ADDED TO SEQ2 FOR SP.

ALEDFWKC 12/03/18 14:02:21 Print Debtor Work Card PAGE 4
 03/12/15 10:26 LAS PAYMENT RECEIVED N 015 03/13 PYR
 03/13/15 11:24 EKP Promise PTP 40.00 On 043015 N 015 04/30 PTP
 04/03/15 09:51 LAS PAYMENT RECEIVED N 015 04/04 PYR
 04/06/15 13:52 EKP Promise PTP 40.00 On 063015 N 015 06/30 PTP
 05/06/15 12:04 BAE PAYMENT RECEIVED N 015 05/07 PYR
 05/07/15 14:41 EKP ADDITIONAL REMARK N 015 06/30 PTP
 PTP ALREADY SET
 06/03/15 10:26 BAE PAYMENT RECEIVED N 015 06/04 PYR
 06/04/15 09:38 EKP Promise PTP 40.00 On 083015 N 015 08/30 PTP
 07/08/15 10:50 BAE PAYMENT RECEIVED N 015 07/09 PYR
 07/09/15 08:52 EKP ADDITIONAL REMARK N 015 08/30 PYR
 08/05/15 15:22 BAE PAYMENT RECEIVED N 015 08/06 PYR
 08/06/15 14:51 EKP Promise PTP 40.00 On 093015 N 015 09/30 PTP
 09/04/15 16:28 BAE PAYMENT RECEIVED N 015 09/05 PYR
 09/09/15 11:52 EKP Promise PTP 40.00 On 113015 N 015 11/30 PTP
 09/21/15 11:54 SJP Action Taken N 015 09/22 NSF
 NSF FROM TRUST POSTING DEBTOR:0008254571
 09/21/15 11:54 SJP Action Taken N 015 09/22 NSF
 NSF FROM TRUST POSTING DEBTOR:0008254572
 09/21/15 11:56 SJP ADDITIONAL REMARK N 015 09/22 NSF
 NSF - VCK DATED 9/1/15 FOR \$40 NOT SUFFICIENT FUNDS + \$45 FST/BANK
 FEE , FEE IS ON TRL # 8254571
 09/22/15 08:31 EKP BROKEN PROMISE N 015 09/23 BRK
 09/23/15 16:58 EKP DTR LTR REQUESTED Y 015 10/13 LTR
 09/23/15 16:58 EKP Ltr to 01 FIRST BROKEN PROMI SNT Y 015 10/13 T08 LTR
 10/07/15 14:46 BAE PAYMENT RECEIVED Y 015 10/08 PYR
 10/07/15 14:59 BAE ADDITIONAL REMARK Y 015 10/08 PYR
 RECD ONLN CK# 0000005233 FOR \$40.00, PUT TOWARDS NSF FEE
 10/08/15 08:41 EKP ADDITIONAL REMARK Y 015 11/30 PTP
 D MADE UP PMT FOR SEPT- STILL HAS NSF FEE TO PAY BUT NEXT PMT NOT DUE
 TIL NOV
 11/04/15 13:34 BAE PAYMENT RECEIVED Y 015 11/05 PYR
 11/04/15 19:23 EKP Promise PTP 40.00 On 013016 Y 015 01/30 PTP
 12/04/15 13:17 BAE PAYMENT RECEIVED Y 015 12/05 PYR
 12/04/15 16:41 EKP ADDITIONAL REMARK Y 015 01/30 PTP
 D SENT IN ANOTHER PMT
 12/21/15 14:05 EKP ADDITIONAL REMARK Y 015 01/30 PTP
 SEV NEW TRLS ADDED
 01/06/16 11:57 BAE PAYMENT RECEIVED Y 015 01/07 PYR
 01/06/16 18:28 EKP Promise PTP 40.00 On 022916 Y 015 02/29 PTP
 01/27/16 14:50 EKP ADDITIONAL REMARK Y 015 02/29 PTP
 NEW TRL SAME INFO
 02/05/16 09:45 BAE PAYMENT RECEIVED Y 015 02/06 PYR
 02/08/16 11:26 EKP Promise PTP 40.00 On 032916 Y 015 03/29 PTP
 03/04/16 16:14 BAE PAYMENT RECEIVED Y 015 03/05 PYR
 03/08/16 09:12 EKP Promise PTP 40.00 On 052916 Y 015 05/29 PTP
 04/12/16 11:14 EKP ADDITIONAL REMARK Y 015 05/29 PTP
 SEV NEW TRLS ADDED
 05/13/16 09:05 EKP ADDITIONAL REMARK Y 015 05/29 PTP
 SEV NEW TRLS ADDED- WILL SEND NEW PPL AFTER NEXT PMT COMES IN
 06/03/16 21:00 CDS BROKEN PROMISE Y 015 06/04 BRK
 #ST="PTP" #LW="151709" #RV="151725"
 06/08/16 11:54 EKP POSSIBLE ASSET FOR LEGAL Y 015 06/22 PAT

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 06/08/16 11:54 EKP Ltr to 01 FIRST BROKEN PROMI SNT Y 015 06/22 T08 PAT
 06/22/16 13:34 EKP POSSIBLE ASSET FOR LEGAL Y 015 07/06 PAT
 07/06/16 16:45 EKP POSSIBLE ASSET FOR LEGAL Y 015 07/20 PAT
 07/06/16 16:45 EKP Ltr to 01 BIESIADA ATTY LETT SNT Y 015 07/20 027 PAT
 07/13/16 14:36 EKP ADDITIONAL REMARK Y 015 07/20 PAT
 RECEIVED CALL FROM GALLON AND TACKUS- REP HER ON TRL 8507485
 07/28/16 08:47 EKP POSSIBLE ASSET FOR LEGAL Y 015 08/11 PAT
 08/01/16 08:25 EKP ADDITIONAL REMARK Y 015 08/11 PYR
 D MADE PMT TO K
 08/01/16 08:26 EKP PAYMENT PLAN START UP Y 015 PAY
 08/22/16 07:53 FST Pymnt Plan Reminder Y 015 JNK PAY
 09/06/16 07:35 NJQ BROKEN PAYMENT PLAN Y 015 09/07 BRP
 #ST="PAY" #LW="151789" #RV="151826"
 09/07/16 11:29 EKP POSSIBLE ASSET FOR LEGAL Y 015 09/21 PAT
 09/23/16 10:37 EKP PAYMENT PLAN START UP Y 015 PAY
 09/23/16 21:02 CDS Pymnt Plan Reminder Y 015 JNK PAY
 10/06/16 21:00 CDS BROKEN PAYMENT PLAN Y 015 10/07 BRP
 #ST="PAY" #LW="151826" #RV="151856"
 10/07/16 09:21 EKP ADDITIONAL REMARK Y 015 11/07 BRP
 10/07/16 09:21 EKP Ltr to 01 FIRST BROKEN PROMI SNT Y 015 11/07 T08 BRP
 11/08/16 16:53 EKP POSSIBLE ASSET FOR LEGAL Y 015 11/22 PAT
 BACK IN PAT ROTATION- NO PMT MADE
 11/25/16 14:39 EKP POSSIBLE ASSET FOR LEGAL Y 015 12/25 PAT
 12/28/16 13:34 EKP LEGAL REVIEW Y 015 01/27 LGR
 12/28/16 13:36 EKP POSSIBLE ASSET FOR LEGAL Y 015 01/21 PAT
 NO PMTS MADE SINCE JULY. REMOVED PIF TRLS. ADDED IN NEW HSE. WILL SEND
 LEGAL NEXT MO.
 01/26/17 13:54 EKP LEGAL REVIEW Y LG1 02/25 LGR
 01/26/17 13:54 EKP Ltr to 01 EMPLOYER LETTER - SNT Y LG1 02/25 T03 LGR
 06/13/17 13:38 HTP Dsk Chg:LG1 To 014 Y 014 06/13 LGR
 06/13/17 13:38 HTP Dsk Chg:LG1 To 014 Y 014 06/13 LGR
 06/14/17 09:57 HTP Sts Chg:LGR To DLS Y 014 DLS
 06/14/17 09:57 HTP Tie Change Y 014 DLS
 07/18/17 17:07 HTP Sts Chg:DLS To ALS Y 014 ALS
 07/18/17 17:07 HTP Tie Change Y 014 ALS
 10/24/17 11:29 BAE Sts Chg:ALS To PYR Y 014 PYR
 10/24/17 11:29 BAE Action Taken Y 014 PYR
 Applied Desk/Status/Priority/Credit Reporting Flag Changes
 from tied account 0009002260
 10/24/17 15:02 BAE Sts Chg:PYR To PIF Y 014 PIF
 10/26/17 12:15 SJP CRDT BUR REPORT PIF Y 014 PIF
 #PR="1" #TF="Y" #T1="Y" #LW="151279"
 02/23/18 09:49 SJP CRDT BUR REPORT PIF Y 014 PIF
 #PR="R" #TF="Y" #T1="Y" #LW="152240"
 03/20/18 17:34 SJP CRDT BUR REPORT PIF Y 014 PIF
 #TCC=" " #T1="Y" #LW="152360"
 04/24/18 12:13 SJP CRDT BUR REPORT PIF Y 014 PIF
 #TCC=" " #T1="Y" #LW="152385"
 04/24/18 18:30 SJP CRDT BUR REPORT PIF Y 014 PIF
 #TCC=" " #T1="Y" #LW="152420"
 05/09/18 12:23 DMM Account Untied Y 014 PIF
 Untied from Header: 2260 TRAILER: 546 GASTON, ROBIE
 05/22/18 11:10 SJP CRDT BUR REPORT PIF Y 014 PIF

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#TCC=" "T1="Y" #LW="152420"			
06/21/18 19:35 SJP CRDT BUR REPORT PIF	Y	014	PIF
#TCC=" "T1="Y" #LW="152448"			
07/23/18 18:13 SJP CRDT BUR REPORT PIF	Y	014	PIF
#TCC=" "T1="Y" #LW="152478"			
08/21/18 12:02 SJP CRDT BUR REPORT PIF	Y	014	PIF
#TCC=" "T1="Y" #LW="152510"			
09/19/18 17:21 SJP CRDT BUR REPORT PIF	Y	014	PIF
#TCC=" "T1="Y" #LW="152539"			
10/23/18 15:56 SJP CRDT BUR REPORT PIF	Y	014	PIF
#TCC=" "T1="Y" #LW="152568"			
11/26/18 18:45 SJP CRDT BUR REPORT PIF	Y	014	PIF
#TCC=" "T1="Y" #LW="152602"			

----- TRUST HISTORY -----								
Date	Batch	UID	DSK	TCD	Description	Amount	Comm	NewBlnc
09/26/13	065059	LAS	039	002	PRIN PMT TO CLIENT	20.00	4.40	46.37
08/28/17	999998	BAE	014	001	PRIN PMT TO AGENCY	41.14	9.05	5.23
10/24/17	079518	BAE	014	001	PRIN PMT TO AGENCY	5.23	1.15	.00

** End of Report **

Exhibit G

Def. FST Produced Account
Notes for Clt Allstar Disposal
and Recycling

SIF
notes from

ALEDFWKC 12/03/18 14:04:25 Print Debtor Work Card PAGE 1
 Clt ALLSTAR DISPOSAL AND RECYCLING Ac# FSTI 001669 419

Rf#							
Nm1	GASTON, ROBIE	Desk	014	Sts	SIF Assignd		157.00
Nm2		Assigned		05/18/15	PrincDue		.00
Adr	6543 SOUTH	L/Charge		11/11/14	In .00 %		.00
		L/Paymnt			Attorney		.00
	HOLLAND, OH 43528	L/Letter		05/18/15	Court		.00
PhN	419-819-8381	L/Worked		11/26/18	Other		.00
		L/Trust		07/27/17	JudInt		.00
		N/Review			Misc		.00
Msg					CntgcyFe		.00
					Tot Due		.00
					Tot Paid		100.00

HISTORY

Date	Time	Uid	Description	CR	Dsk	NxtRv	Txt	NextLtr	Sts
05/18/15	16:03	KMM	New Assignment	Y	019	06/17		1 05/18	HSE
05/18/15	21:00	CDS	Ltr to 01 FIRST LETTER	Y	019	06/17	001	2 06/18	HSE
05/27/15	07:51	DAD	Sts Chg:HSE To RKM	Y	019	06/18		2 06/18	RKM
05/27/15	07:51	DAD	RENKIM UPDATES	Y	019	05/28		1 06/18	RKM
Mail Return Letter# 001 Reason Returned Undeliverable									
05/28/15	08:34	SBS	Sts Chg:RKM To RVW	Y	019	05/28		1 06/18	RVW
05/28/15	08:34	SBS	ACT/PENDING REVIEW	Y	019	05/28			RVW
07/23/15	16:24	DAD	Sts Chg:RVW To MGR	Y	019	05/28			MGR
07/23/15	16:24	DAD	DANELLE TO COLLECTOR	Y	019	07/24			MGR
CLIENT SENT POSS PH# TO TRY									
07/23/15	16:24	DAD	Demographics Change	Y	019	07/24			MGR
Phn1 Chg: TO 4198198381									
Sequence# 01									
07/28/15	08:36	SBS	Sts Chg:MGR To RVW	Y	019	07/24			RVW
07/28/15	08:36	SBS	CALLED PHN 1-LEFT MSGE ON A/M	Y	019	07/28			RVW
07/28/15	08:36	SBS	ACT/PENDING REVIEW	Y	019	07/28			RVW
06/13/17	13:38	HTP	Dsk Chg:019 To 014	Y	014	07/28			RVW
06/13/17	13:38	HTP	Dsk Chg:019 To 014	Y	014	07/28			RVW
06/14/17	09:57	HTP	Sts Chg:RVW To DLS	Y	014				DLS
06/14/17	09:57	HTP	Tie Change	Y	014				DLS
07/18/17	17:07	HTP	Sts Chg:DLS To ALS	Y	014				ALS
07/18/17	17:07	HTP	Tie Change	Y	014				ALS
07/27/17	11:46	BAE	Sts Chg:ALS To PYR	Y	014				PYR
07/27/17	11:46	BAE	PAYMENT RECEIVED	Y	014	07/28			PYR
07/27/17	12:04	BAE	Sts Chg:PYR To ADJ	Y	014	07/28			ADJ
07/27/17	12:04	BAE	ADJUSTED AMOUNT	Y	014	07/28			ADJ
#ST="PYR" #LW="152149" #RV="152150"									
07/27/17	12:04	BAE	Sts Chg:ADJ To SIF	Y	014	07/28			SIF
08/21/17	15:47	SJP	CRDT BUR REPORT PIF	Y	014				SIF
#PR="4" #TF="Y" #T1="Y" #LW="152149"									
02/23/18	08:09	SJP	CRDT BUR REPORT PIF	Y	014				SIF
#PR="R" #TF="Y" #T1="Y" #LW="152174"									
03/20/18	15:42	SJP	CRDT BUR REPORT PIF	Y	014				SIF
#TCC=" " #T1="Y" #LW="152360"									
04/24/18	09:22	SJP	CRDT BUR REPORT PIF	Y	014				SIF
#TCC=" " #T1="Y" #LW="152385"									
04/24/18	15:20	SJP	CRDT BUR REPORT PIF	Y	014				SIF

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#TCC=" "T1="Y" #LW="152420"

05/09/18 12:23 DMM Account Untied

Y 014 05/09

SIF

Untied from Header: 0009002260 TRAILER: 0008608419 GASTON,ROBIE

05/10/18 07:53 HTP Priority Chg:R To

Y 014 05/09

SIF

05/10/18 07:53 HTP DROP REVIEW DATE

Y 014

SIF

05/22/18 09:00 SJP CRDT BUR REPORT PIF

Y 014

SIF

#TCC=" "T1="Y" #LW="152436"

06/21/18 16:42 SJP CRDT BUR REPORT PIF

Y 014

SIF

#TCC=" "T1="Y" #LW="152448"

07/23/18 14:45 SJP CRDT BUR REPORT PIF

Y 014

SIF

#TCC=" "T1="Y" #LW="152478"

08/21/18 10:02 SJP CRDT BUR REPORT PIF

Y 014

SIF

#TCC=" "T1="Y" #LW="152510"

09/19/18 14:26 SJP CRDT BUR REPORT PIF

Y 014

SIF

#TCC=" "T1="Y" #LW="152539"

10/23/18 13:52 SJP CRDT BUR REPORT PIF

Y 014

SIF

#TCC=" "T1="Y" #LW="152568"

11/26/18 15:52 SJP CRDT BUR REPORT PIF

Y 014

SIF

#TCC=" "T1="Y" #LW="152602"

----- TRUST HISTORY -----

Date	Batch	UID	DSK	TCD	Description	Amount	Comm	NewBlnc
07/27/17	078738	BAE	014	002	PRIN PMT TO CLIENT	100.00	33.33	.00
07/27/17	078738	BAE	014	033	PRIN AMT ADJ +/-	57.00-	.00	.00
07/27/17	078738	BAE	014	700	ATTY COMMISSION FEE	6.67	.00	.00

** End of Report **

Exhibit H

Def. FST Produced Account
Notes for Toledo Clinic, Inc.
Reference No. [REDACTED] 870001

ALED FWKC 12/03/18 14:05:29

Print Debtor Work Card

PAGE 1

Clt TOLEDO CLINIC INC

Ac# FSTI 05998 0737

Rf# 70001

Nm1 GASTON, ROBE

Desk 014 Sts PIF Assignd 69.13

Nm2

Assigned 06/18/16 PrincDue .00

Adr 6543 DORR ST APT 43

L/Charge 01/14/15 In .00 % .00

L/Paymnt Attorney .00

TOLEDO, OH 43615-4217

L/Letter 06/18/16 Court .00

PhN 419-819-8381

L/Worked 11/26/18 Other .00

L/Trust 08/02/17 JudInt .00

N/Review Misc .00

Msg

CntgcyFe .00

Tot Due .00

Tot Paid 69.13

----- HISTORY -----

Date	Time	UId	Description	CR	Dsk	NxtRv	Txt	NextLtr	Sts
06/18/16	09:08		New Assignment	Y	002	07/18		1 06/18	HSE
06/18/16	21:00		CDS Ltr to 01 FIRST LETTER	Y	002	07/18	001	2 07/19	HSE
06/22/16	13:33	EKP	Dsk Chg:002 To 015	Y	015	07/19		2 07/19	HSE
06/22/16	13:33	EKP	Dsk Chg:002 To 015	Y	015	07/19		2 07/19	HSE
06/22/16	13:34	EKP	Sts Chg:HSE To PAT	Y	015				PAT
06/22/16	13:34	EKP	Tie Change	Y	015				PAT
12/28/16	13:34	EKP	Sts Chg:PAT To LGR	Y	015				LGR
12/28/16	13:34	EKP	Tie Change	Y	015				LGR
12/28/16	13:36	EKP	Sts Chg:LGR To PAT	Y	015				PAT
12/28/16	13:36	EKP	Tie Change	Y	015				PAT
01/26/17	13:55	EKP	Sts Chg:PAT To LGR	Y	015				LGR
01/26/17	13:55	EKP	Dsk Chg:015 To LG1	Y	LG1				LGR
01/26/17	13:55	EKP	Tie Change	Y	LG1				LGR
06/13/17	13:37	HTP	Account Untied	Y	LG1				LGR
UNTIED FROM HEADER: 0008039732 GASTON, RACHEL									
08/31/11	13:59	MJS	CALLED PHN 1-LEFT MSGE ON A/M	Y	017	09/14			DLS
08/31/11	13:59	MJS	DEMAND LETTER SENT	Y	017	09/14			DLS
08/31/11	13:59	MJS	Ltr to 01 DEMAND LETTER TIED SNT	Y	017	09/14	T02		DLS
09/14/11	12:25	MJS	CALLED PHN 1-LEFT MSGE ON A/M	Y	017	10/14			LLS
09/14/11	12:25	MJS	LAST LTR SENT TO DTR	Y	017	10/14			LLS
09/14/11	12:25	MJS	Ltr to 01 LAST LETTER TIED SNT	Y	017	10/14	T04		LLS
12/01/11	13:33	MJS	ADDITIONAL REMARK	Y	017	12/01			LLS
***LOOKS LIKE THIS D WORKS FOR THE SHERIFFS OFFICE. PER COUNTY EMPLOYEE SIGHT.									
12/01/11	13:34	MJS	ADDITIONAL REMARK	Y	017	12/01			LLS
CORRECTION CENTER.									
12/01/11	13:37	MJS	ADDITIONAL REMARK	Y	017	12/01			LLS
CALLED POE AND WAS TRANSFERRED TO D. THEY STATED THAT SHE COMES IN AFTER									
4									
12/01/11	13:37	MJS	ACT/PENDING REVIEW	Y	017	12/01			RVW
12/02/11	08:25	MJS	ADDITIONAL REMARK	Y	017	12/02			RVW
12/02/11	16:08	MJS	ACT/PENDING REVIEW	Y	017	12/02			RVW
CALLED POE AND NO ANSW.									
03/28/12	19:46	SBD	CALLED PHN 1-LEFT MSGE ON A/M	Y	006	04/27			LGR
ADDED PHONE FROM TRAILER HAS LEGAL THAT IS NOT YET PAYING									
03/28/12	19:46	SBD	CALLED PHN2 - LEFT MSGE ON A/M	Y	006	04/27			LGR
03/28/12	19:46	SBD	LEGAL REVIEW	Y	006	04/27			LGR

FST26

ALEDFWKC 12/03/18 14:05:29	Print Debtor Work Card		PAGE 2
03/28/12 19:46 SBD	GOOGLED DEBTOR	Y 006 04/27	LGR
05/30/12 13:48 SBD	LEGAL REVIEW	Y 006 06/29	LGR
05/30/12 13:49 SBD	ADDITIONAL REMARK	Y 006 06/29	LGR
NO NEW INFO			
07/20/12 10:00 SBD	ACT/PENDING REVIEW	Y 006 07/20	RVW
NOTHING ON LEGAL			
02/11/13 16:50 KPS	CALED PHN 1 - NO ANSWER	Y 010 02/11	RVW
D ALREADY HAS LEGAL THAT HASN'Y RECEIVED ANYTHING BNUT A \$10 PYMT SO FAR. THESE BILLS HAVE RCV'D FIRST AND LAST LETTERS.			
02/11/13 16:50 KPS	TEL BUSY	Y 010 02/11	RVW
02/11/13 16:50 KPS	ACT/PENDING REVIEW	Y 010 02/11	RVW
03/14/13 09:04 AEW	LEGAL COLLECTOR REVIEW	Y 010 03/15	LRV
03/29/13 13:40 KPS	LEGAL REVIEW	Y 010 04/28	LGR
NOT SENDING OUT ANY OTHER LTRS ON THIS UNTIL OTHER CURRENT LEGAL STARTS GETTING PAID OFF SOME MORE.			
06/14/13 09:24 KPS	LEGAL REVIEW	Y 010 07/14	LGR
STILL NO MOVEMENT ON LEGAL CASE. JUST STICKING THIS BACK IN LGR			
06/14/13 15:29 AEW	ADDITIONAL REMARK	Y 010 07/14	LGR
IF NO UPDATES ON H 5942517 BY AUGUST LET ME KNOW AND I WILL RE-CHK WITH ATTY ON STATUS			
08/19/13 13:54 DMM	TEL MADE CONTACT	Y 007 10/18	LGR
CD PH#1. SHE STATED WENT TO DOC TODAY & HASN'T BEEN RELEASED TO RETRN TO EMP. SHE GOES BCK TO DOC IN 2-3WKS TO BE RE-ASSESSED. IS ON MED LEAVE. ADVSD I WILL CB 2MOS TO SEE IF SHE'S RETRND TO EMP & SEE ABT P/A			
08/19/13 13:54 DMM	LEGAL REVIEW	Y 007 10/18	LGR
10/18/13 09:44 DMM	LEGAL REVIEW	Y 007 11/17	LGR
STILL X PYMNTS ON LEGAL			
02/04/14 11:51 EKP	CALLED PHN 1-LEFT MSGE ON A/M	Y 015 03/06	ALS
SENDING NEW ALS FOR PAT			
02/04/14 11:51 EKP	ATTY LTR SENT TO DTR	Y 015 03/06	ALS
02/04/14 11:52 EKP	ATTY LTR SENT TO DTR	Y 015 03/06	ALS
02/04/14 11:52 EKP	Ltr to 01 BIESIADA ATTY LETT SNT	Y 015 03/06 027	ALS
02/04/14 11:52 EKP	POSSIBLE ASSET FOR LEGAL	Y 015 02/18	PAT
03/10/14 15:43 CEL	COLLECTOR TO COLLECTOR	Y 015 03/11	CTC
ADDED THREE NEW Trailers-cel			
03/11/14 09:46 EKP	POSSIBLE ASSET FOR LEGAL	Y 015 03/25	PAT
03/11/14 13:03 EKP	PMT PLAN STARTED	Y 015 03/25	PAY
WANTS TO DO 40/EOM. WILL CALL IN ON THE 28TH TO DO OVER PH. CONFIRMED AD AND WILL AND EXPLAINED ARRANG LETTER GOING OUT WITH UPDATED BALANCE. ADVISED THAT ONCE SHE IS WORKING FT AGAIN SHE NEEDS TO UP THESE PAYMENTS SINCE IT WILL CURRENTLY TAKE HER A LONG TIME TO PAY OFF.			
THIS ACTION SENDS A T06 AUTOMATICALLY			
03/11/14 13:03 EKP	Ltr to 01 PAYMENT PLAN LETTE SNT	Y 015 03/25 T06	PAY
03/11/14 13:03 EKP	PAYMENT PLAN START UP	Y 015	PAY
03/11/14 14:33 LAS	ADDITIONAL REMARK	Y 015	PAY
RECD CK#3005 FOR \$20.00-NOTHING IN IT WINDOW/OK TO APPLY PMT			
03/18/14 21:00 CDS	Pymnt Plan Reminder	Y 015 JNK	PAY
03/26/14 15:32 DMM	HOLD VIRTUAL CHECK PAYMENTS	N PAY 03/26	HVC
DC TO MAKE \$40 CHCK PYMNT FOR MARCH.			
03/27/14 11:00 MEH	PAYMENT RECEIVED	N 015 03/28	PYR
03/27/14 11:40 MEH	ADDITIONAL REMARK	N 015 03/28	PYR

ALDEFWKC	12/03/18	14:05:29	Print Debtor Work Card				PAGE 3
03/27/14	11:40	MEH	Ltr to 01 TIE RECEIPT CHECK SNT	N	015	03/28 RCP	PYR
04/07/14	09:36	EKP	PAYMENT PLAN START UP	N	015		PAY
05/05/14	11:30	EKP	ADDITIONAL REMARK	N	015	07/30	PAY
06/04/14	19:33	EKP	PAYMENT PLAN START UP	N	015		PAY
06/04/14	19:33	EKP	Promise PTP 40.00 On 072514	N	015	07/25	PTP
07/02/14	14:36	LAS	PAYMENT RECEIVED	N	015	07/03	PYR
07/07/14	08:41	EKP	Promise PTP 40.00 On 072514	N	015	07/25	PTP
07/30/14	21:00	CDS	BROKEN PROMISE	N	015	07/31	BRK
#ST="PTP" #LW="151033" #RV="000000"							
08/04/14	12:17	LAS	PAYMENT RECEIVED	N	015	08/05	PYR
08/06/14	19:11	EKP	Promise PTP 40.00 On 091514	N	015	09/15	PTP
09/09/14	14:45	LAS	PAYMENT RECEIVED	N	015	09/10	PYR
09/11/14	13:02	EKP	Promise PTP 40.00 On 100914	N	015	10/09	PTP
09/30/14	11:32	LAS	PAYMENT RECEIVED	N	015	10/01	PYR
10/06/14	09:15	EKP	Promise PTP 40.00 On 113014	N	015	11/30	PTP
10/31/14	13:39	LAS	PAYMENT RECEIVED	N	015	11/01	PYR
11/03/14	09:26	EKP	Promise PTP 40.00 On 122614	N	015	12/26	PTP
12/02/14	15:50	LAS	PAYMENT RECEIVED	N	015	12/03	PYR
12/04/14	08:47	EKP	Promise PTP 40.00 On 013115	N	015	01/31	PTP
01/07/15	12:08	ANM	PAYMENT RECEIVED	N	015	01/08	PYR
01/08/15	16:07	EKP	Promise PTP 40.00 On 022815	N	015	02/28	PTP
02/04/15	10:40	ANM	PAYMENT RECEIVED	N	015	02/05	PYR
02/05/15	09:01	EKP	Promise PTP 40.00 On 042415	N	015	04/24	PTP
03/11/15	19:49	EKP	ADDITIONAL REMARK	N	015	04/24	PTP
ADDED TRL FOR SP SINCE HIS INFO IS ON THE BANKING PMT INFO WE							
RECIEVED. ALSO THE AD ON CHECK IS DIFF FROM HEADER THAT WAS VERIFIED							
PREV SO JUST ADDED TO SEQ2 FOR SP.							
03/12/15	10:26	LAS	PAYMENT RECEIVED	N	015	03/13	PYR
03/13/15	11:24	EKP	Promise PTP 40.00 On 043015	N	015	04/30	PTP
04/03/15	09:51	LAS	PAYMENT RECEIVED	N	015	04/04	PYR
04/06/15	13:52	EKP	Promise PTP 40.00 On 063015	N	015	06/30	PTP
05/06/15	12:04	BAE	PAYMENT RECEIVED	N	015	05/07	PYR
05/07/15	14:41	EKP	ADDITIONAL REMARK	N	015	06/30	PTP
PTP ALREADY SET							
06/03/15	10:26	BAE	PAYMENT RECEIVED	N	015	06/04	PYR
06/04/15	09:38	EKP	Promise PTP 40.00 On 083015	N	015	08/30	PTP
07/08/15	10:50	BAE	PAYMENT RECEIVED	N	015	07/09	PYR
07/09/15	08:52	EKP	ADDITIONAL REMARK	N	015	08/30	PYR
08/05/15	15:22	BAE	PAYMENT RECEIVED	N	015	08/06	PYR
08/06/15	14:51	EKP	Promise PTP 40.00 On 093015	N	015	09/30	PTP
09/04/15	16:28	BAE	PAYMENT RECEIVED	N	015	09/05	PYR
09/09/15	11:52	EKP	Promise PTP 40.00 On 113015	N	015	11/30	PTP
09/21/15	11:54	SJP	Action Taken	N	015	09/22	NSF
NSF FROM TRUST POSTING DEBTOR:0008254571							
09/21/15	11:54	SJP	Action Taken	N	015	09/22	NSF
NSF FROM TRUST POSTING DEBTOR:0008254572							
09/21/15	11:56	SJP	ADDITIONAL REMARK	N	015	09/22	NSF
NSF - VCK DATED 9/1/15 FOR \$40 NOT SUFFICIENT FUNDS + \$45 FST/BANK							
FEE , FEE IS ON TRL # 8254571							
09/22/15	08:31	EKP	BROKEN PROMISE	N	015	09/23	BRK
09/23/15	16:58	EKP	DTR LTR REQUESTED	Y	015	10/13	LTR
09/23/15	16:58	EKP	Ltr to 01 FIRST BROKEN PROMI SNT	Y	015	10/13 T08	LTR
10/07/15	14:46	BAE	PAYMENT RECEIVED	Y	015	10/08	PYR

ALEDFWKC 12/03/18 14:05:29 Print Debtor Work Card PAGE 4
 10/07/15 14:59 BAE ADDITIONAL REMARK Y 015 10/08 PYR
 RECD ONLN CK# 0000005233 FOR \$40.00, PUT TOWARDS NSF FEE
 10/08/15 08:41 EKP ADDITIONAL REMARK Y 015 11/30 PTP
 D MADE UP PMT FOR SEPT- STILL HAS NSF FEE TO PAY BUT NEXT PMT NOT DUE
 TIL NOV
 11/04/15 13:34 BAE PAYMENT RECEIVED Y 015 11/05 PYR
 11/04/15 19:23 EKP Promise PTP 40.00 On 013016 Y 015 01/30 PTP
 12/04/15 13:17 BAE PAYMENT RECEIVED Y 015 12/05 PYR
 12/04/15 16:41 EKP ADDITIONAL REMARK Y 015 01/30 PTP
 D SENT IN ANOTHER PMT
 12/21/15 14:05 EKP ADDITIONAL REMARK Y 015 01/30 PTP
 SEV NEW TRLS ADDED
 01/06/16 11:57 BAE PAYMENT RECEIVED Y 015 01/07 PYR
 01/06/16 18:28 EKP Promise PTP 40.00 On 022916 Y 015 02/29 PTP
 01/27/16 14:50 EKP ADDITIONAL REMARK Y 015 02/29 PTP
 NEW TRL SAME INFO
 02/05/16 09:45 BAE PAYMENT RECEIVED Y 015 02/06 PYR
 02/08/16 11:26 EKP Promise PTP 40.00 On 032916 Y 015 03/29 PTP
 03/04/16 16:14 BAE PAYMENT RECEIVED Y 015 03/05 PYR
 03/08/16 09:12 EKP Promise PTP 40.00 On 052916 Y 015 05/29 PTP
 04/12/16 11:14 EKP ADDITIONAL REMARK Y 015 05/29 PTP
 SEV NEW TRLS ADDED
 05/13/16 09:05 EKP ADDITIONAL REMARK Y 015 05/29 PTP
 SEV NEW TRLS ADDED- WILL SEND NEW PPL AFTER NEXT PMT COMES IN
 06/03/16 21:00 CDS BROKEN PROMISE Y 015 06/04 BRK
 #ST="PTP" #LW="151709" #RV="151725"
 06/08/16 11:54 EKP POSSIBLE ASSET FOR LEGAL Y 015 06/22 PAT
 06/08/16 11:54 EKP Ltr to 01 FIRST BROKEN PROMI SNT Y 015 06/22 T08 PAT
 06/22/16 13:34 EKP POSSIBLE ASSET FOR LEGAL Y 015 07/06 PAT
 07/06/16 16:45 EKP POSSIBLE ASSET FOR LEGAL Y 015 07/20 PAT
 07/06/16 16:45 EKP Ltr to 01 BIESIADA ATTY LETT SNT Y 015 07/20 027 PAT
 07/13/16 14:36 EKP ADDITIONAL REMARK Y 015 07/20 PAT
 RECEIVED CALL FROM GALLON AND TACKUS- REP HER ON TRL 8507485
 07/28/16 08:47 EKP POSSIBLE ASSET FOR LEGAL Y 015 08/11 PAT
 08/01/16 08:25 EKP ADDITIONAL REMARK Y 015 08/11 PYR
 D MADE PMT TO K
 08/01/16 08:26 EKP PAYMENT PLAN START UP Y 015 PAY
 08/22/16 07:53 FST Pymnt Plan Reminder Y 015 JNK PAY
 09/06/16 07:35 NJQ BROKEN PAYMENT PLAN Y 015 09/07 BRP
 #ST="PAY" #LW="151789" #RV="151826"
 09/07/16 11:29 EKP POSSIBLE ASSET FOR LEGAL Y 015 09/21 PAT
 09/23/16 10:37 EKP PAYMENT PLAN START UP Y 015 PAY
 09/23/16 21:02 CDS Pymnt Plan Reminder Y 015 JNK PAY
 10/06/16 21:00 CDS BROKEN PAYMENT PLAN Y 015 10/07 BRP
 #ST="PAY" #LW="151826" #RV="151856"
 10/07/16 09:21 EKP ADDITIONAL REMARK Y 015 11/07 BRP
 10/07/16 09:21 EKP Ltr to 01 FIRST BROKEN PROMI SNT Y 015 11/07 T08 BRP
 11/08/16 16:53 EKP POSSIBLE ASSET FOR LEGAL Y 015 11/22 PAT
 BACK IN PAT ROTATION- NO PMT MADE
 11/25/16 14:39 EKP POSSIBLE ASSET FOR LEGAL Y 015 12/25 PAT
 12/28/16 13:34 EKP LEGAL REVIEW Y 015 01/27 LGR
 12/28/16 13:36 EKP POSSIBLE ASSET FOR LEGAL Y 015 01/21 PAT
 NO PMTS MADE SINCE JULY. REMOVED PIF TRLS. ADDED IN NEW HSE. WILL SEND

AMEDFWKC 12/03/18 14:05:29 Print Debtor Work Card

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LEGAL NEXT MO.

01/26/17 13:54 EKP	LEGAL REVIEW	Y	LG1	02/25	LGR
01/26/17 13:54 EKP	Ltr to 01 EMPLOYER LETTER - SNT	Y	LG1	02/25 T03	LGR
06/13/17 13:38 HTP	Dsk Chg:LG1 To 014	Y	014	06/13	LGR
06/13/17 13:38 HTP	Dsk Chg:LG1 To 014	Y	014	06/13	LGR
06/14/17 09:57 HTP	Sts Chg:LGR To DLS	Y	014		DLS
06/14/17 09:57 HTP	Tie Change	Y	014		DLS
07/18/17 17:07 HTP	Sts Chg:DLS To ALS	Y	014		ALS
07/18/17 17:07 HTP	Tie Change	Y	014		ALS
07/27/17 11:09 BAE	Sts Chg:ALS To PYR	Y	014		PYR
07/27/17 11:09 BAE	Tie Change	Y	014		PYR
07/27/17 11:43 BAE	Sts Chg:PYR To PIF	Y	014		PIF
07/27/17 15:28 SJP	Sts Chg:PIF To REV	Y	014		REV
08/01/17 11:13 AEW	Sts Chg:REV To ALS	Y	014		ALS
08/01/17 11:13 AEW	ADDITIONAL REMARK	Y	014		ALS
08/02/17 10:01 BAE	Sts Chg:ALS To PIF	Y	014		PIF
08/21/17 15:47 SJP	CRDT BUR REPORT PIF	Y	014		PIF
	#PR="1" #TF="Y" #T1=" " #LW="152154"				
02/23/18 12:25 SJP	CRDT BUR REPORT PIF	Y	014		PIF
	#PR="R" #TF="Y" #T1="Y" #LW="152174"				
03/20/18 20:18 SJP	CRDT BUR REPORT PIF	Y	014		PIF
	#TCC=" "T1="Y" #LW="152360"				
04/24/18 00:10 SJP	CRDT BUR REPORT PIF	Y	014		PIF
	#TCC=" "T1="Y" #LW="152385"				
05/09/18 12:23 DMM	Account Untied	Y	014		PIF
	Untied from Header: [REDACTED] 2260 TRAILER: [REDACTED] 90737 GASTON,ROBIE				
05/22/18 14:10 SJP	CRDT BUR REPORT PIF	Y	014		PIF
	#TCC=" "T1="Y" #LW="152420"				
06/21/18 22:34 SJP	CRDT BUR REPORT PIF	Y	014		PIF
	#TCC=" "T1="Y" #LW="152448"				
07/23/18 23:46 SJP	CRDT BUR REPORT PIF	Y	014		PIF
	#TCC=" "T1="Y" #LW="152478"				
08/21/18 15:12 SJP	CRDT BUR REPORT PIF	Y	014		PIF
	#TCC=" "T1="Y" #LW="152510"				
09/19/18 22:52 SJP	CRDT BUR REPORT PIF	Y	014		PIF
	#TCC=" "T1="Y" #LW="152539"				
10/23/18 19:05 SJP	CRDT BUR REPORT PIF	Y	014		PIF
	#TCC=" "T1="Y" #LW="152568"				
11/26/18 23:26 SJP	CRDT BUR REPORT PIF	Y	014		PIF
	#TCC=" "T1="Y" #LW="152602"				

----- TRUST HISTORY -----								
Date	Batch	UID	DSK	TCD	Description	Amount	Comm	NewBlnc
07/27/17	078736	BAE	014	002	PRIN PMT TO CLIENT	69.13	15.90	.00
07/27/17	078736	BAE	014	700	ATTY COMMISSION FEE	3.18	.00	.00
07/27/17	078743	SJP	014	190	REV PRIN PMT TO CLT	69.13-	15.90-	69.13
07/27/17	078743	SJP	014	700	ATTY COMMISSION FEE	3.18-	.00	69.13
08/02/17	999998	BAE	014	001	PRIN PMT TO AGENCY	69.13	15.90	.00

** End of Report **

Exhibit I

Def. FST Produced Account
Notes for Toledo Clinic, Inc.
Reference No. [REDACTED] 730001

ALEDFWKC 12/03/18 13:53:16

Print Debtor Work Card

PAGE 4

Clk TOLEDO CLINIC INC

Ac# FSTI 05998 1425

Rf# 30001

Nm1 GASTON, ROBBIE

Nm2

Adr 6543 DORR ST APT 43

TOLEDO, OH 43615-4217

PhN

Msg

Desk	016	Sts	RVW	Assignd	768.93
Assigned	05/06/16	PrincDue			734.16
L/Charge	01/16/14	In	.00	%	.00
L/Paymnt		Attorney			.00
L/Letter	05/06/16	Court			.00
L/Worked		Other			.00
L/Trust	10/24/17	JudInt			.00
N/Review		Misc			.00
		CntgcyFe			.00
		Tot Due			734.16
		Tot Paid			34.77

HISTORY

Date	Time	Uid	Description	CR	Dsk	NxtRv	Txt	NextLtr	Sts
05/06/16	16:18		New Assignment	Y	030	06/05		1 05/06	HSE
05/06/16	21:02	CDS	Ltr to 01 FIRST LETTER	Y	030	06/05	001	2 06/06	HSE
05/13/16	09:04	EKP	Dsk Chg:030 To 015	Y	015	06/06		2 06/06	HSE
05/13/16	09:04	EKP	Dsk Chg:030 To 015	Y	015	06/06		2 06/06	HSE
06/08/16	11:54	EKP	Sts Chg:HSE To PAT	Y	015				PAT
06/08/16	11:54	EKP	Tie Change	Y	015				PAT
12/28/16	13:34	EKP	Sts Chg:PAT To LGR	Y	015				LGR
12/28/16	13:34	EKP	Tie Change	Y	015				LGR
12/28/16	13:36	EKP	Sts Chg:LGR To PAT	Y	015				PAT
12/28/16	13:36	EKP	Tie Change	Y	015				PAT
01/26/17	13:55	EKP	Sts Chg:PAT To LGR	Y	015				LGR
01/26/17	13:55	EKP	Dsk Chg:015 To LG1	Y	LG1				LGR
01/26/17	13:55	EKP	Tie Change	Y	LG1				LGR
06/13/17	13:37	HTP	Account Untied	Y	LG1				LGR
UNTIED FROM HEADER: 0008039732 GASTON, RACHEL									
08/31/11	13:59	MJS	CALLED PHN 1-LEFT MSGE ON A/M	Y	017	09/14			DLS
08/31/11	13:59	MJS	DEMAND LETTER SENT	Y	017	09/14			DLS
08/31/11	13:59	MJS	Ltr to 01 DEMAND LETTER TIED SNT	Y	017	09/14	T02		DLS
09/14/11	12:25	MJS	CALLED PHN 1-LEFT MSGE ON A/M	Y	017	10/14			LLS
09/14/11	12:25	MJS	LAST LTR SENT TO DTR	Y	017	10/14			LLS
09/14/11	12:25	MJS	Ltr to 01 LAST LETTER TIED SNT	Y	017	10/14	T04		LLS
12/01/11	13:33	MJS	ADDITIONAL REMARK	Y	017	12/01			LLS
***LOOKS LIKE THIS D WORKS FOR THE SHERIFFS OFFICE. PER COUNTY EMPLOYEE SIGHT.									
12/01/11	13:34	MJS	ADDITIONAL REMARK	Y	017	12/01			LLS
CORRECTION CENTER.									
12/01/11	13:37	MJS	ADDITIONAL REMARK	Y	017	12/01			LLS
CALLED POE AND WAS TRANSFERRED TO D. THEY STATED THAT SHE COMES IN AFTER									
4									
12/01/11	13:37	MJS	ACT/PENDING REVIEW	Y	017	12/01			RVW
12/02/11	08:25	MJS	ADDITIONAL REMARK	Y	017	12/02			RVW
12/02/11	16:08	MJS	ACT/PENDING REVIEW	Y	017	12/02			RVW
CALLED POE AND NO ANSW.									
03/28/12	19:46	SBD	CALLED PHN 1-LEFT MSGE ON A/M	Y	006	04/27			LGR
ADDED PHONE FROM TRAILER HAS LEGAL THAT IS NOT YET PAYING									
03/28/12	19:46	SBD	CALLED PHN2 - LFT MSGE ON A/M	Y	006	04/27			LGR
03/28/12	19:46	SBD	LEGAL REVIEW	Y	006	04/27			LGR

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ALEDFWKC 12/03/18 13:53:16	Print Debtor Work Card		PAGE 5
03/28/12 19:46 SBD	GOOGLED DEBTOR	Y 006 04/27	LGR
05/30/12 13:48 SBD	LEGAL REVIEW	Y 006 06/29	LGR
05/30/12 13:49 SBD	ADDITIONAL REMARK	Y 006 06/29	LGR
NO NEW INFO			
07/20/12 10:00 SBD	ACT/PENDING REVIEW	Y 006 07/20	RVW
NOTHING ON LEGAL			
02/11/13 16:50 KPS	CALED PHN 1 - NO ANSWER	Y 010 02/11	RVW
D ALREADY HAS LEGAL THAT HASN'Y RECEIVED ANYTHING BNUT A \$10 PYMT SO FAR. THESE BILLS HAVE RCV'D FIRST AND LAST LETTERS.			
02/11/13 16:50 KPS	TEL BUSY	Y 010 02/11	RVW
02/11/13 16:50 KPS	ACT/PENDING REVIEW	Y 010 02/11	RVW
03/14/13 09:04 AEW	LEGAL COLLECTOR REVIEW	Y 010 03/15	LRV
03/29/13 13:40 KPS	LEGAL REVIEW	Y 010 04/28	LGR
NOT SENDING OUT ANY OTHER LTRS ON THIS UNTIL OTHER CURRENT LEGAL STARTS GETTING PAID OFF SOME MORE.			
06/14/13 09:24 KPS	LEGAL REVIEW	Y 010 07/14	LGR
STILL NO MOVEMENT ON LEGAL CASE. JUST STICKING THIS BACK IN LGR			
06/14/13 15:29 AEW	ADDITIONAL REMARK	Y 010 07/14	LGR
IF NO UPDATES ON H 5942517 BY AUGUST LET ME KNOW AND I WILL RE-CHK WITH ATTY ON STATUS			
08/19/13 13:54 DMM	TEL MADE CONTACT	Y 007 10/18	LGR
CD PH#1. SHE STATED WENT TO DOC TODAY & HASN'T BEEN RELEASED TO RETRN TO EMP. SHE GOES BCK TO DOC IN 2-3WKS TO BE RE-ASSESSED. IS ON MED LEAVE. ADVSD I WILL CB 2MOS TO SEE IF SHE'S RETRND TO EMP & SEE ABT P/A			
08/19/13 13:54 DMM	LEGAL REVIEW	Y 007 10/18	LGR
10/18/13 09:44 DMM	LEGAL REVIEW	Y 007 11/17	LGR
STILL X PYMNTS ON LEGAL			
02/04/14 11:51 EKP	CALLED PHN 1-LEFT MSGE ON A/M	Y 015 03/06	ALS
SENDING NEW ALS FOR PAT			
02/04/14 11:51 EKP	ATTY LTR SENT TO DTR	Y 015 03/06	ALS
02/04/14 11:52 EKP	ATTY LTR SENT TO DTR	Y 015 03/06	ALS
02/04/14 11:52 EKP	Ltr to 01 BIESIADA ATTY LETT SNT	Y 015 03/06 027	ALS
02/04/14 11:52 EKP	POSSIBLE ASSET FOR LEGAL	Y 015 02/18	PAT
03/10/14 15:43 CEL	COLLECTOR TO COLLECTOR	Y 015 03/11	CTC
ADDED THREE NEW Trailers-cel			
03/11/14 09:46 EKP	POSSIBLE ASSET FOR LEGAL	Y 015 03/25	PAT
03/11/14 13:03 EKP	PMT PLAN STARTED	Y 015 03/25	PAY
WANTS TO DO 40/EOM. WILL CALL IN ON THE 28TH TO DO OVER PH. CONFIRMED AD AND WILL AND EXPLAINED ARRANG LETTER GOING OUT WITH UPDATED BALANCE. ADVISED THAT ONCE SHE IS WORKING FT AGAIN SHE NEEDS TO UP THESE PAYMENTS SINCE IT WILL CURRENTLY TAKE HER A LONG TIME TO PAY OFF.			
THIS ACTION SENDS A T06 AUTOMATICALLY			
03/11/14 13:03 EKP	Ltr to 01 PAYMENT PLAN LETTE SNT	Y 015 03/25 T06	PAY
03/11/14 13:03 EKP	PAYMENT PLAN START UP	Y 015	PAY
03/11/14 14:33 LAS	ADDITIONAL REMARK	Y 015	PAY
RECD CK#3005 FOR \$20.00-NOTHING IN IT WINDOW/OK TO APPLY PMT			
03/18/14 21:00 CDS	Pymnt Plan Reminder	Y 015 JNK	PAY
03/26/14 15:32 DMM	HOLD VIRTUAL CHECK PAYMENTS	N PAY 03/26	HVC
DC TO MAKE \$40 CHCK PYMNT FOR MARCH.			
03/27/14 11:00 MEH	PAYMENT RECEIVED	N 015 03/28	PYR
03/27/14 11:40 MEH	ADDITIONAL REMARK	N 015 03/28	PYR

										PAGE	6
ALEDFWKC	12/03/18	13:53:16	Print Debtor Work Card								
03/27/14	11:40	MEH	Ltr to 01 TIE RECEIPT CHECK	SNT	N	015	03/28	RCP		PYR	
04/07/14	09:36	EKP	PAYMENT PLAN START UP		N	015				PAY	
05/05/14	11:30	EKP	ADDITIONAL REMARK		N	015	07/30			PAY	
06/04/14	19:33	EKP	PAYMENT PLAN START UP		N	015				PAY	
06/04/14	19:33	EKP	Promise PTP 40.00 On 072514		N	015	07/25			PTP	
07/02/14	14:36	LAS	PAYMENT RECEIVED		N	015	07/03			PYR	
07/07/14	08:41	EKP	Promise PTP 40.00 On 072514		N	015	07/25			PTP	
07/30/14	21:00	CDS	BROKEN PROMISE		N	015	07/31			BRK	
#ST="PTP" #LW="151033" #RV="000000"											
08/04/14	12:17	LAS	PAYMENT RECEIVED		N	015	08/05			PYR	
08/06/14	19:11	EKP	Promise PTP 40.00 On 091514		N	015	09/15			PTP	
09/09/14	14:45	LAS	PAYMENT RECEIVED		N	015	09/10			PYR	
09/11/14	13:02	EKP	Promise PTP 40.00 On 100914		N	015	10/09			PTP	
09/30/14	11:32	LAS	PAYMENT RECEIVED		N	015	10/01			PYR	
10/06/14	09:15	EKP	Promise PTP 40.00 On 113014		N	015	11/30			PTP	
10/31/14	13:39	LAS	PAYMENT RECEIVED		N	015	11/01			PYR	
11/03/14	09:26	EKP	Promise PTP 40.00 On 122614		N	015	12/26			PTP	
12/02/14	15:50	LAS	PAYMENT RECEIVED		N	015	12/03			PYR	
12/04/14	08:47	EKP	Promise PTP 40.00 On 013115		N	015	01/31			PTP	
01/07/15	12:08	ANM	PAYMENT RECEIVED		N	015	01/08			PYR	
01/08/15	16:07	EKP	Promise PTP 40.00 On 022815		N	015	02/28			PTP	
02/04/15	10:40	ANM	PAYMENT RECEIVED		N	015	02/05			PYR	
02/05/15	09:01	EKP	Promise PTP 40.00 On 042415		N	015	04/24			PTP	
03/11/15	19:49	EKP	ADDITIONAL REMARK		N	015	04/24			PTP	
ADDED TRL FOR SP SINCE HIS INFO IS ON THE BANKING PMT INFO WE											
RECIEVED. ALSO THE AD ON CHECK IS DIFF FROM HEADER THAT WAS VERIFIED											
PREV SO JUST ADDED TO SEQ2 FOR SP.											
03/12/15	10:26	LAS	PAYMENT RECEIVED		N	015	03/13			PYR	
03/13/15	11:24	EKP	Promise PTP 40.00 On 043015		N	015	04/30			PTP	
04/03/15	09:51	LAS	PAYMENT RECEIVED		N	015	04/04			PYR	
04/06/15	13:52	EKP	Promise PTP 40.00 On 063015		N	015	06/30			PTP	
05/06/15	12:04	BAE	PAYMENT RECEIVED		N	015	05/07			PYR	
05/07/15	14:41	EKP	ADDITIONAL REMARK		N	015	06/30			PTP	
PTP ALREADY SET											
06/03/15	10:26	BAE	PAYMENT RECEIVED		N	015	06/04			PYR	
06/04/15	09:38	EKP	Promise PTP 40.00 On 083015		N	015	08/30			PTP	
07/08/15	10:50	BAE	PAYMENT RECEIVED		N	015	07/09			PYR	
07/09/15	08:52	EKP	ADDITIONAL REMARK		N	015	08/30			PYR	
08/05/15	15:22	BAE	PAYMENT RECEIVED		N	015	08/06			PYR	
08/06/15	14:51	EKP	Promise PTP 40.00 On 093015		N	015	09/30			PTP	
09/04/15	16:28	BAE	PAYMENT RECEIVED		N	015	09/05			PYR	
09/09/15	11:52	EKP	Promise PTP 40.00 On 113015		N	015	11/30			PTP	
09/21/15	11:54	SJP	Action Taken		N	015	09/22			NSF	
NSF FROM TRUST POSTING DEBTOR: [REDACTED] 4571											
09/21/15	11:54	SJP	Action Taken		N	015	09/22			NSF	
NSF FROM TRUST POSTING DEBTOR: [REDACTED] 4572											
09/21/15	11:56	SJP	ADDITIONAL REMARK		N	015	09/22			NSF	
NSF - VCK DATED 9/1/15 FOR \$40 NOT SUFFICIENT FUNDS + \$45 FST/BANK											
FEE , FEE IS ON TRL # 8254571											
09/22/15	08:31	EKP	BROKEN PROMISE		N	015	09/23			BRK	
09/23/15	16:58	EKP	DTR LTR REQUESTED		Y	015	10/13			LTR	
09/23/15	16:58	EKP	Ltr to 01 FIRST BROKEN PROMI SNT	Y	015	10/13	T08			LTR	
10/07/15	14:46	BAE	PAYMENT RECEIVED		Y	015	10/08			PYR	

ALEDFWKC 12/03/18 13:53:16 Print Debtor Work Card PAGE 7
 10/07/15 14:59 BAE ADDITIONAL REMARK Y 015 10/08 PYR
 RECD ONLN CK# 0000005233 FOR \$40.00, PUT TOWARDS NSF FEE
 10/08/15 08:41 EKP ADDITIONAL REMARK Y 015 11/30 PTP
 D MADE UP PMT FOR SEPT- STILL HAS NSF FEE TO PAY BUT NEXT PMT NOT DUE
 TIL NOV
 11/04/15 13:34 BAE PAYMENT RECEIVED Y 015 11/05 PYR
 11/04/15 19:23 EKP Promise PTP 40.00 On 013016 Y 015 01/30 PTP
 12/04/15 13:17 BAE PAYMENT RECEIVED Y 015 12/05 PYR
 12/04/15 16:41 EKP ADDITIONAL REMARK Y 015 01/30 PTP
 D SENT IN ANOTHER PMT
 12/21/15 14:05 EKP ADDITIONAL REMARK Y 015 01/30 PTP
 SEV NEW TRLS ADDED
 01/06/16 11:57 BAE PAYMENT RECEIVED Y 015 01/07 PYR
 01/06/16 18:28 EKP Promise PTP 40.00 On 022916 Y 015 02/29 PTP
 01/27/16 14:50 EKP ADDITIONAL REMARK Y 015 02/29 PTP
 NEW TRL SAME INFO
 02/05/16 09:45 BAE PAYMENT RECEIVED Y 015 02/06 PYR
 02/08/16 11:26 EKP Promise PTP 40.00 On 032916 Y 015 03/29 PTP
 03/04/16 16:14 BAE PAYMENT RECEIVED Y 015 03/05 PYR
 03/08/16 09:12 EKP Promise PTP 40.00 On 052916 Y 015 05/29 PTP
 04/12/16 11:14 EKP ADDITIONAL REMARK Y 015 05/29 PTP
 SEV NEW TRLS ADDED
 05/13/16 09:05 EKP ADDITIONAL REMARK Y 015 05/29 PTP
 SEV NEW TRLS ADDED- WILL SEND NEW PPL AFTER NEXT PMT COMES IN
 06/03/16 21:00 CDS BROKEN PROMISE Y 015 06/04 BRK
 #ST="PTP" #LW="151709" #RV="151725"
 06/08/16 11:54 EKP POSSIBLE ASSET FOR LEGAL Y 015 06/22 PAT
 06/08/16 11:54 EKP Ltr to 01 FIRST BROKEN PROMI SNT Y 015 06/22 T08 PAT
 06/22/16 13:34 EKP POSSIBLE ASSET FOR LEGAL Y 015 07/06 PAT
 07/06/16 16:45 EKP POSSIBLE ASSET FOR LEGAL Y 015 07/20 PAT
 07/06/16 16:45 EKP Ltr to 01 BIESIADA ATTY LETT SNT Y 015 07/20 027 PAT
 07/13/16 14:36 EKP ADDITIONAL REMARK Y 015 07/20 PAT
 RECEIVED CALL FROM GALLON AND TACKUS- REP HER ON TRL 8507485
 07/28/16 08:47 EKP POSSIBLE ASSET FOR LEGAL Y 015 08/11 PAT
 08/01/16 08:25 EKP ADDITIONAL REMARK Y 015 08/11 PYR
 D MADE PMT TO K
 08/01/16 08:26 EKP PAYMENT PLAN START UP Y 015 PAY
 08/22/16 07:53 FST Pymnt Plan Reminder Y 015 JNK PAY
 09/06/16 07:35 NJQ BROKEN PAYMENT PLAN Y 015 09/07 BRP
 #ST="PAY" #LW="151789" #RV="151826"
 09/07/16 11:29 EKP POSSIBLE ASSET FOR LEGAL Y 015 09/21 PAT
 09/23/16 10:37 EKP PAYMENT PLAN START UP Y 015 PAY
 09/23/16 21:02 CDS Pymnt Plan Reminder Y 015 JNK PAY
 10/06/16 21:00 CDS BROKEN PAYMENT PLAN Y 015 10/07 BRP
 #ST="PAY" #LW="151826" #RV="151856"
 10/07/16 09:21 EKP ADDITIONAL REMARK Y 015 11/07 BRP
 10/07/16 09:21 EKP Ltr to 01 FIRST BROKEN PROMI SNT Y 015 11/07 T08 BRP
 11/08/16 16:53 EKP POSSIBLE ASSET FOR LEGAL Y 015 11/22 PAT
 BACK IN PAT ROTATION- NO PMT MADE
 11/25/16 14:39 EKP POSSIBLE ASSET FOR LEGAL Y 015 12/25 PAT
 12/28/16 13:34 EKP LEGAL REVIEW Y 015 01/27 LGR
 12/28/16 13:36 EKP POSSIBLE ASSET FOR LEGAL Y 015 01/21 PAT
 NO PMTS MADE SINCE JULY. REMOVED PIF TRLS. ADDED IN NEW HSE. WILL SEND

ALEDFWKC 12/03/18 13:53:16 Print Debtor Work Card

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LEGAL NEXT MO.

01/26/17 13:54 EKP	LEGAL REVIEW	Y	LG1 02/25	LGR
01/26/17 13:54 EKP	Ltr to 01 EMPLOYER LETTER - SNT	Y	LG1 02/25 T03	LGR
06/13/17 13:38 HTP	Dsk Chg:LG1 To 014	Y	014 06/13	LGR
06/13/17 13:38 HTP	Dsk Chg:LG1 To 014	Y	014 06/13	LGR
06/14/17 09:57 HTP	Sts Chg:LGR To DLS	Y	014	DLS
06/14/17 09:57 HTP	Tie Change	Y	014	DLS
07/18/17 17:07 HTP	Sts Chg:DLS To ALS	Y	014	ALS
07/18/17 17:07 HTP	Tie Change	Y	014	ALS
10/24/17 11:29 BAE	Sts Chg:ALS To PYR	Y	014	PYR
10/24/17 11:29 BAE	Action Taken	Y	014	PYR

Applied Desk/Status/Priority/Credit Reporting Flag Changes
from tied account [REDACTED] 2260

01/12/18 15:31 HTP	Sts Chg:PYR To LLS	Y	014	LLS
01/12/18 15:31 HTP	Action Taken	Y	014	LLS

Applied Desk/Status/Priority/Credit Reporting Flag Changes
from tied account 0009002260

05/09/18 12:23 DMM	Sts Chg:LLS To RVW	Y	014	RVW
05/09/18 12:23 DMM	Dsk Chg:014 To 007	Y	007	RVW
11/27/18 08:09 AEW	Dsk Chg:007 To 016	Y	016	RVW
11/27/18 08:09 AEW	Action Taken	Y	016	RVW

Applied Desk/Status/Priority/Credit Reporting Flag Changes
from tied account [REDACTED] 2260

11/27/18 08:10 AEW	Demographics Change	Y	016	RVW
Phnl Chg:4198198381 TO Sequence# 01				

----- TRUST HISTORY -----								
Date	Batch	UID	DSK	TCD	Description	Amount	Comm	NowBlnc
10/24/17	079518	BAE	014	001	PRIN PMT TO AGENCY	34.77	7.99	734.16

Exhibit J

Def. FST Produced Account
Notes for Toledo Clinic, Inc.

Reference No. [REDACTED] 786

1601954

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Cl# THE TOLEDO CLINIC INC

Ac# FSTI 059981 2831

Rf# 5786 1601954

Nm1 GASTON, ROBE

Nm2

Adr 6543 DORR ST APT G43

TOLEDO, OH 43615-4217

PhN

Msg

Desk	016	Sts	RVW	Assignd	41.14
Assigned	05/10/17	PrincDue			41.14
L/Charge	12/28/16	In	.00	%	.00
L/Paymnt		Attorney			.00
L/Letter	05/10/17	Court			.00
L/Worked		Other			.00
L/Trust	07/27/17	JudInt			.00
N/Review		Misc			.00
		CntgcyFe			.00
		Tot Due			41.14
		Tot Paid			.00

HISTORY

Date	Time	Uid	Description	CR	Dsk	NxtRv	Txt	NextLtr	Sts
05/10/17	10:09		New Assignment	N	014	06/09	1	05/10	HSE
05/10/17	21:00	CDS	Ltr to 01 FIRST LETTER	N	014	06/09	001 2	06/10	HSE
06/10/17	21:00	CDS	Ltr to 01 JUNK LETTER	N	014	06/10	JNK 3	06/10	HSE
06/10/17	21:00	CDS	Ltr/Ser Completed	N	014	06/10			HSE
06/10/17	21:00	CDS	Sts Chg:HSE To NEW	N	014	06/10			NEW
06/10/17	21:00	CDS	NEW BUSINESS	N	014	06/11			NEW
06/13/17	13:38	HTP	Account Tied	N	014	06/11			NEW
06/14/17	09:57	HTP	Sts Chg:NEW To DLS	N	014				DLS
06/14/17	09:57	HTP	Tie Change	N	014				DLS
07/18/17	17:07	HTP	Sts Chg:DLS To ALS	N	014				ALS
07/18/17	17:07	HTP	Tie Change	N	014				ALS
07/27/17	11:09	BAE	Sts Chg:ALS To PYR	N	014				PYR
07/27/17	11:09	BAE	Tie Change	N	014				PYR
07/27/17	11:43	BAE	Sts Chg:PYR To PIF	N	014				PIF
07/27/17	15:28	SJP	Sts Chg:PIF To REV	N	014				REV
08/01/17	11:13	AEW	Sts Chg:REV To ALS	N	014				ALS
08/01/17	11:13	AEW	Tie Change	N	014				ALS
01/12/18	15:31	HTP	Sts Chg:ALS To LLS	N	014				LLS
01/12/18	15:31	HTP	Action Taken	N	014				LLS

Applied Desk/Status/Priority/Credit Reporting Flag Changes

from tied account 0009002260

05/09/18	12:23	DMM	Sts Chg:LLS To RVW	N	014				RVW
05/09/18	12:23	DMM	Dsk Chg:014 To 007	N	007				RVW
11/27/18	08:09	AEW	Dsk Chg:007 To 016	N	016				RVW
11/27/18	08:09	AEW	Action Taken	N	016				RVW

Applied Desk/Status/Priority/Credit Reporting Flag Changes

from tied account 2260

11/27/18	08:10	AEW	Demographics Change	N	016				RVW
Phn1 Chg:4198198381 TO									
Sequence# 01									

TRUST HISTORY

Date	Batch	UID	DSK	TCD	Description	Amount	Comm	NewBlnc
07/27/17	078736	BAE	014	002	PRIN PMT TO CLIENT	41.14	9.46	.00
07/27/17	078736	BAE	014	700	ATTY COMMISSION FEE	1.89	.00	.00
07/27/17	078743	SJP	014	190	REV PRIN PMT TO CLT	41.14-	9.46-	41.14
07/27/17	078743	SJP	014	700	ATTY COMMISSION FEE	1.89-	.00	41.14

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Exhibit L

Def. FST Produced Account
Notes for Various Accounts

ALEDFWKC 12/03/18 13:53:16 Print Debtor Work Card PAGE 1
 Clt VARIOUS ACCOUNTS Ac# FSTY ZZZZZZ 2260
 Rf#
 Nm1 GASTON,ROBIE Desk 016 Sts RVW Assignd 1018.66
 Nm2 Assigned 04/04/18 PrincDue 983.89
 Adr DORR ST APT G43 L/Charge In .00 % .00
 L/Paymnt Attorney .00
 TOLEDO, OH 43615-4217 L/Letter 01/12/18 Court .00
 PhN L/Worked 11/27/18 Other .00
 L/Trust 10/24/17 JudInt .00
 N/Review 11/27/18 Misc .00
 Msg CntgcyFe .00
 Tot Due 983.89
 Tot Paid 34.77

----- HISTORY -----

Date	Time	UId	Description	CR	Dsk	NxtRv	Txt	NextLtr	Sts
06/13/17	13:38	HTP	Account Tied		014	06/14			NEW
06/13/17	13:38	HTP	Tie Change		014	06/14			NEW
			Account [REDACTED] 831 Tied						
06/13/17	13:38	HTP	Tie Change		014	06/14			NEW
			Account [REDACTED] 1425 Tied						
06/13/17	13:38	HTP	Tie Change		014	06/14			NEW
			Account [REDACTED] 0737 Tied						
06/13/17	13:38	HTP	Tie Change		014	06/14			NEW
			Account [REDACTED] 9546 Tied						
06/13/17	13:38	HTP	Tie Change		014	06/14			NEW
			Account [REDACTED] 8419 Tied						
06/14/17	09:57	HTP	Sts Chg:NEW To DLS		014	06/14			DLS
06/14/17	09:57	HTP	CALLED PHN 1-LEFT MSGE ON A/M	Y	014	06/28			DLS
06/14/17	09:57	HTP	DEMAND LETTER SENT	Y	014	06/28			DLS
06/14/17	09:57	HTP	Ltr to 01 DEMAND LETTER TIED SNT	Y	014	06/28	T02		DLS
06/29/17	12:58	HTP	ADDITIONAL REMARK	Y	014	07/15			DLS
			CD, HE IS DRIVING, WILL CALL ME BACK TOMORROW MORNING						
07/18/17	17:06	HTP	Sts Chg:DLS To ALS	Y	014	07/15			ALS
07/18/17	17:06	HTP	CALED PHN 1 - NO ANSWER	Y	014	08/17			ALS
07/18/17	17:06	HTP	ATTY LTR SENT TO DTR	Y	014	08/17			ALS
07/18/17	17:06	HTP	Ltr to 01 BIESIADA ATTY LETT SNT	Y	014	08/17	027		ALS
07/18/17	17:07	HTP	Instr to Trans Exp 08/18/17	Y	014	08/17			ALS
			B 7-18-17						
07/25/17	15:24	SRD	Check/EFT/CC Requested	Y	014	08/17			ALS
			EPPCC: Name: GASTON,ROBIE						
			Acct# [REDACTED] 8972 Exp 06/20						
			PMT 08/01/17 \$ 69.13						
07/25/17	15:24	SRD	Check/EFT/CC Requested	Y	014	08/17			ALS
			EPPCC: Name: GASTON,ROBIE						
			Acct# [REDACTED] 8972 Exp 06/20						
			08/25/17 41.14						
07/25/17	15:29	SRD	Instr to Trans Exp 08/18/17	Y	014	08/17			ALS
			B 7-18-17						
			PLEASE APPLY PAYMENT 69.13 TO -8790737						
			PLEASE APPLY PAYMENT 41.14 TO 8982831						
07/25/17	15:29	SRD	Sts Chg:ALS To PYR	Y	014	08/17			PYR
07/25/17	15:29	SRD	PAYMENT RECEIVED	Y	014	08/01			PYR

ALEDFWKC 12/03/18 13:53:16 Print Debtor Work Card PAGE 2
 D CALLED IN AND SET UP AUTO FOR THE TWO ACCNTS-
 *8/1/17--\$69.13 -ID#:8790737
 *8/25/17--\$41.14-ID#:8982831
 TALKED TO ALLSTART AND THEY ARE GETTING HIM MORE INFO. WANST AT THAT
 ADDRESS THAT DOS. BUT WILL CALL BACK IN SEPT TO SET UP MORE PAYMENTS.
 07/25/17 15:30 SRD Instr to Trans Exp 08/18/17 Y 014 08/01 PYR
 B 7-18-17
 PLEASE APPLY PAYMENT 69.13 TO 8790737
 PLEASE APPLY PAYMENT 41.14 TO 8982831
 07/26/17 12:32 NJQ Sts Chg:PYR To HCP Y 014 08/01 HCP
 07/26/17 12:32 NJQ Dsk Chg:014 To PAY Y PAY 08/01 HCP
 07/26/17 12:32 NJQ ADDITIONAL REMARK N PAY 07/27 HCP
 KC(CRISTEN) SD THEY AGRD TO ACCT 100.00 AS SIF WILL GV INFO TO BKKPNG
 DIRECTLY SINCE INFO IN "IT" FOR POST DATED PYMNTS
 07/27/17 11:08 BAE Sts Chg:HCP To PYR N PAY 07/27 PYR
 07/27/17 11:08 BAE Dsk Chg:PAY To 014 N 014 07/27 PYR
 07/27/17 11:08 BAE PAYMENT RECEIVED N 014 07/28 PYR
 07/28/17 16:11 HTP Sts Chg:PYR To HCC N 014 07/28 HCC
 07/28/17 16:11 HTP HOLD CREDIT CARD PAYMENTS N 014 08/01 HCC
 08/01/17 16:49 BAE Check/EFT/CC Requested N 014 08/01 HCC
 EPPCC: Name GASTON,ROBIE
 APPROVED 21261C Approved
 PDate: 08/01/17 Amt: Acct# 5146 1601 09298972
 08/02/17 13:01 HTP HOLD CREDIT CARD PAYMENTS N 014 08/25 HCC
 08/25/17 16:48 BAE Check/EFT/CC Requested N 014 08/25 HCC
 EPPCC: Name GASTON,ROBIE
 APPROVED 9763CF Approved
 PDate: 08/25/17 Amt: Acct# 5146 1601 09298972
 08/28/17 15:29 HTP Sts Chg:HCC To CRV N 014 08/25 CRV
 08/28/17 15:29 HTP COLLECTOR REVIEW Y 014 09/27 CRV
 08/28/17 15:29 HTP Sts Chg:CRV To PTP Y 014 09/27 PTP
 08/28/17 15:29 HTP Promise PTP 40.00 On 092817 Y 014 09/28 PTP
 08/28/17 15:29 HTP Rescheduled HTP 09/08/17 1529 Y 014 09/28 PTP
 Rescheduled HTP 09/08/17 1529
 09/08/17 15:30 HTP CALLED PHN 1-LEFT MSGE ON A/M Y 014 09/28 PTP
 10/03/17 21:00 CDS Sts Chg:PTP To BRK Y 014 09/28 BRK
 10/03/17 21:00 CDS BROKEN PROMISE Y 014 10/04 BRK
 #ST="PTP" #LW="152192" #RV="152212"
 10/06/17 11:33 HTP CALLED PHN 1-LEFT MSGE ON A/M Y 014 10/06 BRK
 10/13/17 14:45 HTP ADDITIONAL REMARK Y 014 10/20 BRK
 CD, HE WILL MAIL PMT TOMORRWO, FORGOT
 10/20/17 14:42 HTP ADDITIONAL REMARK Y 014 10/20 BRK
 CD MAILING TODAY, HAD IN HIS CAR AND FORGOT TO MAIL
 10/24/17 11:29 BAE Sts Chg:BRK To PYR Y 014 10/20 PYR
 10/24/17 11:29 BAE PAYMENT RECEIVED Y 014 10/25 PYR
 10/25/17 11:20 HTP Sts Chg:PYR To PTP Y 014 10/25 PTP
 10/25/17 11:20 HTP Promise PTP 40.00 On 112017 Y 014 11/20 PTP
 11/25/17 21:00 CDS Sts Chg:PTP To BRK Y 014 11/20 BRK
 11/25/17 21:00 CDS BROKEN PROMISE Y 014 11/26 BRK
 #ST="PTP" #LW="152239" #RV="152265"
 12/01/17 15:26 HTP CALLED PHN 1-LEFT MSGE ON A/M Y 014 12/01 BRK
 12/15/17 14:03 HTP CALED PHN 1 - NO ANSWER Y 014 12/15 BRK
 12/29/17 09:23 HTP Sts Chg:BRK To PRL Y 014 12/15 PRL

ALEDFWKC 12/03/18 13:53:16 Print Debtor Work Card PAGE 3
 12/29/17 09:23 HTP CALED PHN 1 - NO ANSWER Y 014 01/12 PRL
 12/29/17 09:23 HTP PMT REMINDER LTR Y 014 01/12 PRL
 12/29/17 09:23 HTP Ltr to 01 FIRST BROKEN PROMI SNT Y 014 01/12 T08 PRL
 01/12/18 15:31 HTP Sts Chg:PRL To LLS Y 014 01/12 LLS
~~01/12/18 15:31 HTP CALED PHN 1 - NO ANSWER Y 014 02/11 LLS~~
~~01/12/18 15:31 HTP LAST LTR SENT TO DTR Y 014 02/11 LLS~~
~~01/12/18 15:31 HTP Ltr to 01 LAST LETTER TIED SNT Y 014 02/11 T04 LLS~~
 05/09/18 12:23 DMM Account Untied Y 014 02/11 LLS
 Untied from Header: [REDACTED] 260 TRAILER: [REDACTED] 9546 GASTON,ROBIE
 05/09/18 12:23 DMM Account Untied Y 014 02/11 LLS
 Untied from Header: [REDACTED] 260 TRAILER: [REDACTED] 419 GASTON,ROBIE
 05/09/18 12:23 DMM Account Untied Y 014 02/11 LLS
 Untied from Header: [REDACTED] 260 TRAILER: [REDACTED] 737 GASTON,ROBIE
 05/09/18 12:23 DMM Dsk Chg:014 To 007 Y 007 02/11 LLS
 05/09/18 12:23 DMM Account Tied Y 007 02/11 LLS
 Tied to Header: [REDACTED] 260 Trailer: [REDACTED] 510 GASTON,ROBIE
 05/09/18 12:23 DMM Tie Change Y 007 02/11 LLS
 Account [REDACTED] 510 Tied
 05/09/18 12:27 DMM Sts Chg:LLS To RVW Y 007 02/11 RVW
 05/09/18 12:27 DMM CALED PHN 1 - NO ANSWER Y 007 05/09 RVW
 CD, MAN ANSWERD "HELLO" AND DIDN'T SAY ANYTHING MORE. HEARD CAR NOISES
 IN THE BACKROUND
 05/09/18 12:27 DMM ACT/PENDING REVIEW Y 007 05/09 RVW
 11/27/18 08:09 AEW Dsk Chg:007 To 016 Y 016 05/09 RVW
 11/27/18 08:09 AEW ADDITIONAL REMARK Y 016 11/27 RVW
 DO NOT WORK THIS ACCT/PENDING LEGAL ACTION TAKEN BY D - SEE AEP IF ANY
 QUESTIONS
 11/27/18 08:10 AEW Account Memo Modified Y 016 11/27 RVW
 Account Memo change from:
 11/27/18 08:10 AEW Demographics Change Y 016 11/27 RVW
 Addr1 Chg:6543 DORR ST APT G43 TO DORR ST APT G43
 Phn1 Chg:4198198381 TO
 Sequence# 01
 11/27/18 08:11 AEW Demographics Change Y 016 11/27 RVW
 Addr1 Chg: DORR ST APT G43 TO DORR ST APT G43
 Sequence# 01

Exhibit M

January 15, 2018 Letter from
Financial Systems of Toledo, Inc.



FINANCE SYSTEM OF TOLEDO, INC.
PO Box 1934
Southgate, MI 48195-0934

CREDITOR: SEE REVERSE SIDE
FST ID NUMBER: 0009002260



Roble Gaston
6543 Dorr St Apt G43
Toledo, OH 43615-4217

IF PAYING BY MASTERCARD, DISCOVER, VISA OR AMERICAN EXPRESS, FILL OUT BELOW.

<input type="checkbox"/> MasterCard	<input type="checkbox"/> Discover	<input type="checkbox"/> VISA	<input type="checkbox"/> VISA	<input type="checkbox"/> American Express*
CARD NUMBER		EXP. DATE	AMOUNT	
SIGNATURE		MUST INCLUDE 3 DIGIT SECURITY CODE FROM BACK OF CARD		

AMOUNT DUE: \$775.30

DATE: 01/15/18

Phone: (419) 578-4343 * Toll Free: (888) 665-6665 * Fax: (419) 578-4330

SHOW AMOUNT
PAID HERE

\$

MAKE CHECKS PAYABLE TO:



FINANCE SYSTEM OF TOLEDO, INC.
PO BOX 351297
TOLEDO, OH 43635-1297

*** PLEASE DETACH AND RETURN TOP PORTION WITH YOUR PAYMENT ***

DATE: 01/15/18

FST104

643019010724

13420001179/0003

CREDITOR: SEE REVERSE SIDE
TOTAL AMOUNT DUE: \$775.30
FST ID NUMBER: 0009002260

THIS BILL MAY BE LISTED AGAINST YOUR CREDIT!

IT IS IN YOUR BEST INTEREST TO RESPOND IMMEDIATELY. ANY UNPAID BALANCE SHOWING ON YOUR CREDIT REPORT MAY RESULT IN CREDIT BEING DENIED.

PAY IN FULL IMMEDIATELY TO:

FINANCE SYSTEM OF TOLEDO, INC.

PLEASE DO NOT HESITATE TO CONTACT ME TO RESOLVE THIS IMPORTANT MATTER.

MRS. MEGAN STARR
419-578-2676

PLEASE SEE REVERSE SIDE FOR ACCOUNT INFORMATION.

MAKE YOUR PAYMENT ONLINE AT www.FST1952.COM
* USING FST ID NUMBER: 0009002260

THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. ALL RETURNED CHECKS ARE SUBJECT TO A \$30.00 SERVICE CHARGE PLUS BANK FEES.



FINANCE SYSTEM OF TOLEDO, INC.
2821 N. Holland-Sylvania Rd.
PO Box 351297
Toledo, OH 43635-1297
Phone: (419) 578-4343 * Toll Free: (888) 665-6665
Fax: (419) 578-4330

GASTON 000002

<u>Client Name</u>	<u>Client Ref No</u>	<u>Principal</u>	<u>Interest</u>	<u>Other</u>	<u>Total</u>
EPHO INC TOLEDO	400	.00	.00	.00	.00
DATE OF SERVICE	12/25/12	.00	.00	.00	.00
ALLSTAR DISPOSAL					
DATE OF SERVICE	11/11/14	734.16	.00	.00	734.16
TOLEDO CLINIC I	2000000001				
DATE OF SERVICE	01/16/14	.00	.00	.00	.00
TOLEDO CLINIC I	0000000001				
DATE OF SERVICE	01/14/15	41.14	.00	.00	41.14
TOLEDO CLINIC I	0000000006 16019				
DATE OF SERVICE	12/28/16				
					<u>775.30</u>